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A,



August 21, 1998

Mr. George Opek
United States Environmental
Protection Agency
SECTION DE-J9
77 West Jackson
Chicago, Illinois 60604

Re:

Aero Plating Works, 1860 North Elston, Chicago, Illinois Closure

Information - EPA I. D. No. ILD005125836

Dear Mr. Opek:

ACES ENVIRONMENTAL has submitted the original Closure Report on January 27, 1994, for the above-mentioned property. Also enclosed is the environmental review conducted by the USEPA, confirming the closure activities at the site by TechLaw, Inc. on April 23, 1993.

Along with this information, I am also enclosing a copy of the plat of survey with the deed restriction included, and a copy of the Quit Claim Deed, executed by Mr. Seymour Shiner, the owner, identifying the existence of contaminated soil at the site.

Also enclosed please find a copy of a July 17, 1997 50-foot soil bore, identifying the soil composition and ground water level at the existing property. These were the last three items of information that the State EPA had requested to finalize the closure at the site.

These documents, along with the review conducted by TechLaw, Inc. on April 23, 1998 authorized by the USEPA, should suffice to finalize the closure activity.

Should you have any further questions, please contact my office.

Sincerely,

Daniel T. Coyne

President

DTC:pjf
Enclosures

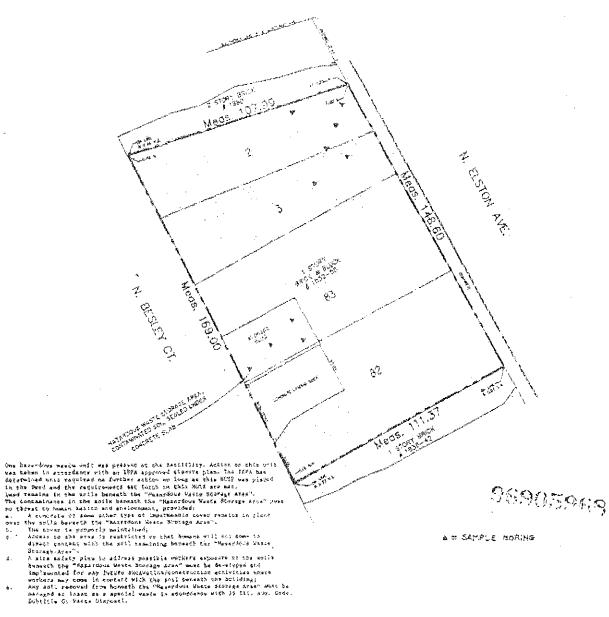
SURVEY OF Ьц

PROME (8(8) 735-1344 FAX (312) 736-4615

JOHN D. MOTIQUE PROFESSIONAL LAND SURVEYORS 3458 N. CICERO AVE. CHICAGO, E. 60841

SUB-LOTE 2 AND 3 IN PITCHERSHIP PROURDINGHOUNDED FIOT RAIN BLOCK 20 IN SHEPPIELD'S ADDITION TO CHICAGO BY THE DIJUTHMENT 1/4 OF SECTION 22, TOWNSHIP NO NORTH, RANGE 14 EAST OF THE THRO PRINCIPAL MERICON, IN COCK COUNTY.

LOTS BE AND BE IN THE SUBDINGION OF BLOCK ED IN SHERFELD'S ADDITION TO CHICAGO IN THE SOUTHWEST TAY OF SECTION 52, TOWNSHIP AS NORTH, RANGE 14 EAST OF THE THIRD FRINCIPEL MERCHAN, IN COOK COUNTY, SLINGIS.



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STATE :	55 6	LLINGIS	~ ^
COUNTY	O.F	$\mathcal{Q}\mathcal{Q}\mathcal{Q}\mathcal{K}$	S.S.

I, JOHN D. MOTIGUE AN ILLINOIS PROFESSIONAL LAND SURVEYOR DO HERBEY CERTURY THAT I HAVE SURVEYED THE ABOVE DESCRIDED PROPERTY AND THAT THE PLAT WEILSON EMAIN IS A CONFECT REPRESENTATION OF SAID SONIE.

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BY whiles	uzvigis Literak	H-12.		App -		5—s

QUIT CLAIM DEED

GRANTOR: SEYMOUR SHINER,

96905968

Of the City of Chicago,
County of Cook,
State of Rimois;
When Recorded return to:
John R. Ruddy
29 S. La Salle St., #82
Chicago, IL 60603

- 02mT-01 RECREDING - またい。 - 146666 - 1845 - 1789 - 11,29796 - 14411460 - キ3484 の 文字 - 米一学送 - 学担でダム5 - COOK - COUNTY - PECORDER

For the sum of One Doltar (\$1.00) and other good and valuable consideration, in hand paid. ACTUAL CONSIDERATION LESS THAN ONE HUNDRED DOLLARS, (\$100.00), Conveys and Quit Claims to, SEYMOUR SHINER, whose address is, 2244. W. Arthur St., Chicago, Illinois, the following described premises, situated in the City of Chicago, County of Cook, State of Illinois:

SUB-LOTS 2 AND 3 IN PITZGIBBON'S RESUBDIVISION OF LOTIST IN BLOCK 20 IN SIEFFFIELD'S ADDITION TO CHICAGO IN THE SOUTHWEST IT THE SECTION 32, TOWNSHIP 46 NORTH, RANGE 14 EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY IT LINOIS

LOTS REAND SEEN THE RESUBDIVISION OF BLOCK 20 IN SIGNFIELD'S ADDITION TO CHICAGO IN THE SOUTHWEST THE OF SECTION RESUMENSHIP 40 NORTH, RANGE 14 EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLENOIS.

PERMANENT INDEX NO. 14-32-301/006, 14-32-301-005, AND 14-33-301-004, PROPERTY ADDRESS: 18-46-1858 N. ELSTON AVE., CHICAGO, N.

hereby releasing and waiving all rights under and by virtue of the Laws of the State of Illinois, subject to:

NOTE: I. One hazardous waste unit was present at the facility. Action on this unit was taken in accordance with an IEPA approved closure plan. The IEPA has determined unit required no further action so long as this note was placed in the Deed and requirements set forth in this Note are met.

- 11. Load remains in the soils beneath the "Hazardous Wasto Storage Area"
- III. The contaminants in the soils beneath the "Hazardous Waste Storage Area" pose no threat to human health and environment provided;
 - a. A concrete or some other type of importmeable cover remains in place over the soils beneath the "Hazardous Waste Storage Afea"
 - b. The cover is properly maintained.
 - c. Access to the area is restricted so that humans will not come in direct contact with the soils remaining beneath the "Hazardous Waite Storage Area".
 - d. A site safety plan to address possible worker exposure to soils beneath the "hazardous Waste Storage Area" must be developed and implemented for any future excavation/construction activities where workers may come into contact—with the soil—beneath the building.
 - e. Any soil removed from beneath the "Hazardous Waste Storage Area" must be managed at least as a special waste in accordance with 35 fill. Adm. Code, Subsitte G: Waste Disposal.
- IV. A survey plan has been developed which shows the location and dimensions of the building, relative to the legal boundaries of the locations from which the soil samples were collected from the "Hazardous Waste Storage Area" are shown on said plan which has been prepared and certified by a professional surveyor and a copy attached hereto

DATEDOS 18th day of Morverabe 4096 SEYMOUR SHINER

DEFECTAL SEAL."

JOHN R. RUDDY

NEETY PLOCE SATE OF 15/15/97

A COMMISSION EXPIRES 10/15/97

NOTARY PUBLIC

98985958

State of Illinois, County of Cook ss., I the undersigned, a Notary Public in and for said County, in the State. raforesaid. DO CERTEY that SEYMOUR SHEER, personally known to me to be the same person whose name is subscribed to the foregoing instrument appeared before me this day in person, and acknowledged that he signed, sealed and delivered the said instrument as his free and voluntary act, for the uses and purposes therein set forth

Given under my hand and official seal this 18th day of November, 1996

My Commission expires 627 15 1999

This instrument was prepared by: John R. Ruddy, 29 S. LaSalle St., Chicago, H.

Fifty Foot Soil Bore to Identify Soil Composition and Groundwater Level

On July 17, 1997, D. & G. DRILLING INC. of New Lenox, Illinois was retained by ACES ENVIRONMENTAL to complete one (1) fifty foot soil bore at 1860 North Elston, Chicago, Illinois to determine the depth at which there was groundwater, and investigate the geological composition of the surrounding soil. ACES ENVIRONMENTAL's intentions were to determine whether or not the contamination from subsurface soils at 1860 North Elston would have a potential environmental impact to the surrounding soil and groundwater.

The geological bore was taken directly outside the double loading dock doors in the west alleyway. The soil bore was extended to a maximum depth of fifty (50) feet.

The boring did not reveal any metal debris or exhibit any signs of contamination such as discoloration or unusual odors. Soil samples collected by ACES ENVIRONMENTAL from a stainless steel split spoon sampler were tested on site by a P.I.D. meter. Samples were extracted from random depths of three (3) feet, five (5) feet, seven (7) feet, ten (10) feet, twelve (12) feet, fifteen (15) feet, and twenty (20 to twenty-four (24) feet. Readings from the P.I.D. meter indicated no sign of soil contamination. Material

extracted from the bore consisted of gravel fill, black soil, sand, silt, and clay. The groundwater table was encountered at twenty-five (25) to thirty (30) feet below the subsurface.

Based on the geological soil bore performed by D. & G.
DRILLING INC., ACES ENVIRONMENTAL feels that the metal
contamination which existed below the subsurface at 1860
North Elston, Chicago, Illinois has not had any
environmental impact to the surrounding groundwater.

RE:	031	62	: No.: A 30004 1258	TORA SITE COUK COUNTY	60CA71NG	I: # 1 - FOR GROUND WATER	Pag	;ĉ: <u>,</u>	/ of /
Sito	Nanz	s: /	860	N. ELSTON AVE		D: 50' BORE IN COTSIDE LEADN			Start 9-17 7:45. Finish 9-17 2:00 2.1
Sample Number	Sample Type	Sample Recovery	Depth (feet)	Detailed Soil and Rock		 Natural Moisture Co △	F. Co. C.	OVA/PID/PID	Remarks
	<u>ئې</u>	5RIT =800		GRAVEL / SAND GREY CLAY SAND/ SILTY C. GREY CLAY GREY CLAY CLAY + SILT MIX CLAY AND SILT MIX	TER SILT		W/N	PID 3-5 THROUGHOUT	NO COC OF PRICOCONTION THROUGHOUT BREE OR SPLIT SPEEN SAMPUNO
A	Depth	White States After After States State	tion lines or Data ile Drillin or Drillin	Kotary Depth 30'	Rig Type T. M. Geologist D	oil types may be gradu	al.		Illinois Environmental Protection Agency

MR. SEYMOUR SHINER 2244 West Arthur Chicago, Illinois 60645

RCRA SITE CLEANUP

AND

CLOSURE PLAN

FOR:

Former Aero Plating Company 1850 - 1860 North Elston Chicago, Illinois 60622

ACES MAINTENANCE



January 27, 1994

Illinois Environmental Protection Agency Division of Land Pollution Control Bureau of Land 2200 Churchill Road Springfield, IL 62794-9276

Attn: Mr. Lawrence W. Eastep

P.E., Manager

Re: 0316230004 -- Cook County

Aero Plating Co. ILD005125836 RCRA Closure Log No. 677

Dear Mr. Eastep:

ACES MAINTENANCE is in receipt of the Illinois Environmental Protection Agency's letter dated February 11, 1993, requesting that the closure plan for the 1850-1860 North Elston location in Chicago, Illinois be completely revised. In an effort to comply with the Agency's regulations and guidelines concerning the closure of a hazardous waste storage facility, ACES MAINTENANCE has completed a revised closure plan for review. A copy of the IEPA's letter with closure report references and a RCRA Interim Status Report follows this introduction.

Respectfully submitted,

ACES MAINTENANCE

Daniel Ti Coyne

Dan Coyne

Environmental Director

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/524-3300

February 11, 1993

Mr. Seymour Shiner 2244 W. Arthur Chicago, Illinois 60645

Re: 0316230004 -- Cook County
Aero Plating Co.
ILD005125836
RCRA Closure
Log No. 677

Received: Novermber 13, 1992

Dear Mr. Shiner:

The report entitled <u>Site Cleanup and Closure Report</u>, <u>Former Aero Plating Company</u>. 1850-1860 North Elston, <u>Chicago</u>, <u>Illinois</u>, <u>Seymour Shiner</u>, <u>May 15</u>, 1992, prepared by Aces Maintenance has been reviewed by this Agency. This report was handled as a closure plan modification request, due to the fact that a plan to close the hazardous waste management units at this facility was previously approved by the Agency.

Due to the following deficiencies, the closure plan modification request for the hazardous waste management units at the one and two story buildings located at the addresses of 1850-1860 North Elston, Chicago, IL 60622 is hereby disapproved:

- 1. Based upon the review of the historical operations of the site and the longevity in time taken to clean close the site, IEPA has determined that the entire facility needs to be completely accessed for closure. Several years have gone by without proper closure activities taking place while new businesses have moved in and began their own renovations and operations within these buildings. As such, the following information must be provided regarding the two buildings so that the Agency has a well organized and complete closure plan for proper decision making regarding this matter:
 - a. A legible scaled topographic map showing the location of the facility must be provided.
 - (Refer to Exhibit 'A')
 b. Legible complete detailed scaled drawings of both buildings at the addresses of 1850-1860 North Elston, as they currently exist, must be provided. These drawings must:

(Refer to Exhibit 'B')

- 1. Identify the current floor plan of the two
 buildings; (Refer to Exhibit 'B')
- 2. Identify the tenant of each area presently occupied within the buildings; (Refer to Exhibit B
- Include numbered arrows indicating the locations and directions of the photographs taken, as required in item c below, for cross-referencing the photographs and the detailed scaled drawings.
- (Refer to Exhibit 'C')

 4. Identify the presence of any drainage troughs, floor drains, subsurface pipes from the floor drains present where hazardous wastes were stored/transported/treated, etc. with flow directions and outlets indicated. These items shall be photographed and the locations depicted on scaled drawings.

 (Refer to Exhibit 'C')
- 5. Identify the location of the former hazardous waste management units once present at the facility. (Refer to Exhibit 'B')

The scaled drawings required by this item must be developed and certified by a registered professional engineer.

- c. Colored photographs of each unit within the two buildings must be provided. These photographs must completely depict, for each area, the flooring ceiling, walls, beams, piping, drains, any secondary containment device that could have contained plating materials, etc. The photographs must be:
 - taken by an independent registered professional engineer;
 - 2. mounted on 8.5" x 11" paper;

(Refer to Exhibit 'C')

- 3. numbered;
- 4. described by direction of exposure;
- 5. be noted by the time and date of exposure.
- d. A description of each area within both buildings including past and present occupants and uses, and present conditions of each area. This description should be supplemented by and refer to the required photographs. (Refer to Part 'A')
- e. A description of the renovation/cleanup activities that have taken place through out the two buildings and not taken place in each unit since the time that Aero Plating Co. was required to begin closure activities. This will require (1) a review of historical data, (2) an inspection of each unit, (3) and interviews with past/present occupants by an independent registered professional engineer. Documentation of the activities in this item is

necessary.

- f. Information regarding decontamination and disposition of all equipment associated with the operations of Aero Plating. (Refer to Part'C' & Exhibit 'E')
- g. Information regarding closure activities at the hazardous waste management units undergoing closure in accordance with the previously approved closure plan. (Refer to Part 'C')
- The results of a detailed integrity inspection of the concrete floor in the basement of the building at 1860 and the ground floor in the building at 1850. The subject closure plan stated that "The structural integrity of the concrete floor in the process and storage area was examined and found to be in good condition". However, insufficient information was provided to support this statement. Therefore, the integrity of these floors must be re-inspected, including information to substantiate the conclusions, must be submitted to the Agency. The goal of this inspection must be to determine if there are any cracks, joints or other defects in these floors which would allow any spills or other releases of hazardous waste to migrate through the floor into the underlying soil. The inspection shall be carried out in accordance with standards and recommendations of professional/technical entities such as the American Concrete Institute, the Portland Cement Association, the American Society for Testing and Materials, the American Society of Civil Engineers, etc. as they relate to the ability of concrete structures to contain liquids. The documentation resulting from this inspection shall include the following information:
 - 1. The results of the inspection; (Refer to Part 'B')
 - 2. Scaled drawings showing the location of all cracks and construction joints observed during the inspection; (Refer to Exhibit 'B')
 - 3. Scaled drawings with arrows that indicate sloping directions on the concrete surface to demonstrate the flow patterns should spills occur. These drawings should easily be cross-referenced with the scaled drawings of Condition 1 item b;

 (Refer to Exhibit 'B')
 - 4. Scaled drawings that indicate any repair work conducted upon the concrete where past defects could have potentially allowed migration of hazardous waste or hazardous constituents. These drawings should easily be cross-referenced with the scaled drawings of Condition 1 item b;
 - (Refer to Exhibit 'B')
 5. Conclusions reached from the inspection regarding the potential for hazardous wastes and/or constituents to migrate through any

cracks, construction joints, etc. observed in the areas of concern; and

5. Justification for the conclusions reached from the inspection (e.g., information must be provided which indicates that any construction joints in the areas of concern are indeed watertight).

(Refer to Part 'B')

2. The "Chemical Analysis of Soil" provided in Figure 5 of the proposed closure plan indicates that contamination was detected at all three horizontal sampling locations. These locations were described in the text of the closure plan as being located at the "former area of nickel solution process treatment tank, former area of waste water treatment equipment and chemical storage room used to store waste sludge from nickel treatment, storage area "B". Further sampling at these locations is necessary to determine the vertical and horizontal extent of contamination. Further sampling efforts in these areas shall follow the procedures and instructions in accordance with this letter. (Refer to Exhibit 'D')

Pursuant to 35 IAC 725.212(d)(4), you must submit a complete, revised closure plan (i.e., not just revised or additional pages) within thirty days which adequately responds to the above-noted deficiencies. The original and three copies must be submitted to the Agency. Failure to submit a revised plan within thirty (30) days will be considered non-compliance with the requirements of 35 IAC 725, Subpart G.

Should you have any questions regarding this matter, please contact Gregg Sanders at 217/524-3300.

Very truly yours,

Laurence W Easter My Jian

Lawrence W. Eastep, P.E., Manager Permit Section Division of Land Pollution Control Bureau of Land

LWE: MGS: mgs

cc: USEPA Region V -- George Hamper USEPA Region V -- John J. Breslin Aces Maintenance

UMITS UMOERGOING CLOSURE (continued)

<u>Unit</u>	Unit Code	Number of Units Closing	Capacity	On Part A
Treatment: Tank (Aboveground) Surface Impoundment Incinerator Other (explain)	T01 T02 T03 T04	1 1 49	100 gal. 2,400 sq.ft. 55 gal drums	
<u>Disposal</u> : Landfill Land Application Surface Impoundment	D80 D81 D83	1	Unknown	

CERTIFICATION AND SIGNATURE (Must be completed for all submittals. Certification and signature requirements are set forth in 35 IAC 702.126. Any submittal involving engineering plans, specifications and calculations as defined in the Illinois Professional Engineering Act and 68 IAC 1380 must be signed and certified by an Illinois registered professional.)

All closure plans, post-closure plans and modifications must be signed by the person designated below or by a duly authorized representative of that person:

Comporation - By a principal executive officer of at least the level of vice-president. Partnership or Sole Proprietorship - By a general partner or the proprietor, respectively. Government - By either a principal executive officer or a ranking elected official.

A person is a duly authorized representative only if:

JM:sf/sp/1243r,1-2

- 1. the authorization is made in writing by a person described above; and
- is submitted with this application (a copy of a previously submitted authorization can be used).

I contify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Owner Signature: Summer Shand	2/14/94 (Date)
Operator Signature: Title:	(Date)
Engineer Signature: MC DAY (if necessary) Engineer Name: JAMES MC ELFOY Engineer Address: 9819 S. MILL AND ST. EVERCINEEN PK, IL 60642	1-27-94 (Date) Engineer Seal:
Engineer Phone No.: 708-499-5963	s Agency is authorized to require this information under Illinois vised Statutes, 1979, Chapter 111 1/2, Section 1039, Disclosure

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of this information is required under that Section. Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms

Management Center.



RCRA INTERIM STATUS CLOSURE AND POST-CLOSURE CARE PLANS GENERAL FORM LPC-PA18

THIS FORM MUST ACCOMPANY ANY RORA INTERIM-STATUS CLOSURE AND/OR POST-CLOSURE CARE PLANS OR MODIFICATION REQUEST SUBMITTED TO THE DIVISION OF LAND POLLUTION CONTROL. THE ORIGINAL AND TWO COPIES OF ALL DOCUMENTS SUBMITTED MUST BE PROVIDED.

FACILITY IDENTIFICATION (Information abaddressed in this closure plan)	oout the facility where the units are located which are
Name: Aero Plating Company	County: Cook
Street Address: 1850-1860 N. Elsto	on Ave site # (IEPA): 0316230004
city: Chicago	site No. (USEPA): <u>ILD005125836</u>
	
OWNER INFORMATION	OPERATOR INFORMATION
Mame: Mr. Seymour Shiner	
Mailing 2244 W. Arthur	
Chicago, IL 60645	
Contact Name: Mr. Dan Coyne	
	octor
Contact Title: Environmental Dire	<u> </u>
Phone #: (708) 690-0189	·
TYPE OF SUBMISSION (check applicable i	tem and provide requested information, as applicable)
Original (New) Closure Plan	
Original (New) Post-Closure Plan	
Response to Disapproval letter	
X Modification Request	/ / Submittal (Log No if known)
Add: (Tohat : Alformation Tot	7 /
DESCRIPTION OF SUBMITTAL: (briefly de	
Modified closure plan for	the hazardous waste clean-up at 1850-1860
North Elston Avenue facili	ty.
LIST OF DOCUMENTS SUBMITTED (identify IEPA's disapproval letter da	all documents in this submittal, including the cover letter; ated 2/11/93; Log No. 677
UNITS UNDERGOING CLOSURE (please identicapacities and whether they are on the	tify what type of units are addressed in the plan, their e RCRA Part A for the facility)
Un	
<u>Unit</u> <u>Co</u>	de Units Closing Capacity (Y/N)
Storage:	1 <u>49</u> 55 <u>gal.</u> drums
Container (barrel, drum, etc.) \$0 Tank \$0	100 001
Waste Pile \$0.	
Surface Impoundment SD	4 <u>1</u> 2,400 sq.ft.

UNITS UNDERGOING CLOSURE (continued)

Unit	Unit Code	Number of Units Closing	Capacity	On Pert A
Ireatment: Yank (Aboveground) Surface Impoundment Incinerator Other (explain)	T 0 1 T 0 2 T 0 3 T 0 4	1 1 49	100 gal. 2,400 sq.ft. 55 gal drums	
<u>Disposat</u> : Landfill	D80		Unknown	***************************************
Land Application Surface Impoundment	D81			

CERTIFICATION AND SIGNATURE (Must be completed for all submittals. Certification and signature requirements are set forth in 35 IAC 702.126. Any submittal involving engineering plans, specifications and calculations as defined in the Illinois Professional Engineering Act and 68 IAC 1380 must be signed and certified by an Illinois registered professional.)

All closure plans, post-closure plans and modifications must be signed by the person designated below or by a duly authorized representative of that person:

Corparation - By a principal executive officer of at least the level of vice-president. Partnership or Sole Proprietorship - By a general partner or the proprietor, respectively. Government - By either a principal executive officer or a ranking elected official.

A person is a duly authorized representative only if:

JM:sf/sp/1243r,1-2

- 1. the authorization is made in writing by a person described above; and
- 2. is submitted with this application (a copy of a previously submitted authorization can be used).

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and avaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Owner Signature: Title:	DUNER DUNER	2/1/19 4 (Date)	
Operator Signature:		(Date)	
Engineer Signature: (if necessary) Engineer Name: Engineer Address:	JAMES MCELROY 9819 S. MILLARD ST.	1-27-94 (Date) Engineer Seal:	
	EVEROREEN PK, IL 6064:	۷	
Engineer Phone No.:		his Agency is authorized to require this info evised Statutes, 1979, Chapter 111 1/2, S	

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Management Center.

of this information is required under that Section. Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms

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PART 'A'

DESCRIPTION OF FACILITY TENANTS

January 27, 1994

Illinois Environmental Protection Agency Division of Land Pollution Control Bureau of Land 2200 Churchill Road Springfield, IL 62794-9276

Attn: Mr. Lawrence W. Eastep P.E., Manager

Re: 0316230004 -- Cook County Aero Plating Co. ILD005125836 RČRA Closure Log No. 677

Dear Mr. Eastep:

The following section will detail operations of all tenants residing at the facility 1850-1860 North Elston Avenue in Chicago, Illinois. Detail of the facility operations will begin with the hazardous waste generator, Aero Plating Company, and end with the present tenants, River West and LSL Medical Industries. This time period covers approximately fifty years beginning with Louis J. Maiorano, Jr.'s purchase of the building in 1944. The building was sold to the present owner, Seymour Shiner, in 1988 and he is currently renting the space to the above mentioned tenants.

Respectfully submitted,

ACES MAINTENANCE

Daniel Moyae

Dan Coyne

Environmental Director

January 27, 1994

Page 1

PART 'A': DESCRIPTION OF FACILITY TEMANTS

I. Aero Plating Company:

Aero Plating Company operated a job shop electroplating facility in

an establishment encompassing two connected buildings. Business

operations were located at the present site address of 1850-1860

North Elston Avenue in Chicago, Illinois. A copy of the

appropriate portion of the 7.5 minute U.S. Geological Survey

quadrangle map is in Exhibit 'A'.

The owner of Aero Plating Company, Louis J. Maiorano, Jr., ceased

operations in 1984 after forty years of business. During that

time, nickel plating operations were the specific type of

electroplating being conducted by the company. At no time did Aero

Plating intend to be become a hazardous waste storage facility. In

error, the facility violated the requirement of a hazardous waste

generator by not limiting the storage of waste generated on site to

a period of less than 90 days.

Descriptions of the facility during the time Aero Plating was

present will be made in order of business operations. This will

detail each area's specific activities and give indication to their

business processes.

Metal Stripping Area: Aero Plating Company's business received

January 27, 1994

Page 2

PART 'A': (CONTINUED)

Aero Plating Company: (Continued)

decrepit or bare metal objects that they would strip clean and finish with a nickel finish. If the metal had a decrepit surface, the object was first taken to the basement of the two story building, 1860 North Elston Avenue. It was stripped clean so the finishing processes upstairs could adhere to the metal object. Within the basement there existed two one hundred gallon above ground tanks. Mr. Maiorano, Jr.'s company did not use these tanks as storage for hazardous waste materials in excess of 90 days. Instead they were used as holding tanks, in which the material was transferred to the waste water pretreatment area of 1850 North Elston's first floor. Attempts were made to clean floor spillage during the stripping process and deposit it into the holding tanks as well. Once the metal was cleaned, it was brought up to the first floor of 1860 North Elston. Refer to Aero Plating's operations floor plan in Exhibit 'B' for the location of the metal stripping area.

<u>Plating Line:</u> With the metal cleaned in the basement, it was sent along the plating line located on the first floor, where a nickel finish was applied for refurbishing. The nickel solutions used in the plating process were also located on the same floor. The nickel solution process tank was located east of the

January 27, 1994

Page 3

PART 'A': (CONTINUED)

Aero Plating Company: (Continued)

plating line in the east end of the two story building, 1860 North Elston. Refer to Aero Plating's operations floor plan in Exhibit 'B' for the location of the plating line and nickel solution tank.

waste water Treatment Equipment: Waste products from the basement stripping area and plating line were taken to the waste water treatment area in the northeast corner of 1850 North Elston. Waste products received in this area were subjected to a pretreatment process that would separate hazardous chemicals from the clean water solutions. Once separated, the water was discharged east into the publicly owned sanitary sewer lines located under Elston Avenue. Hazardous waste produced from the pretreatment process and sludge generated from the plating line was stored in an above ground tank located in the southwest corner of 1850 North Elston Avenue. Refer to Aero Plating's operations floor plan in Exhibit 'B' for the location of the waste water pretreatment equipment area.

Hazardous Waste Storage Area: Hazardous wastes stored in the above ground tank was located in the southwest area of 1850 North Elston Avenue. It is in this area that Aero Plating violated the

January 27, 1994

Page 4

PART 'A': (CONTINUED)

Aero Plating Company: (Continued)

requirements of a hazardous waste generator by exceeding storage of hazardous wastes for 90 days. Refer to Aero Plating's operations floor plan in Exhibit 'B' for the location of the storage area.

II. Art Gallery, Offices, & Furniture Shop:

After Aero Plating ceased operations in 1984, Mr. Maiorano, Jr. rented the facility space to other tenants. The two story building located at 1860 North Elston Avenue was used for offices, an art gallery, and theater until 1988 when Mr. Shiner purchased the property. The second floor was utilized as office space with the art gallery and small theater located on the first floor. The basement functioned as a storage area for the art gallery's non-hazardous materials.

The one story building at 1850 North Elston was utilized by a furniture shop. Operations were confined to the northern portion of this building. This firm was in the business of manufacturing rattan furniture and showcased products in a portion of the area. The southern portion was vacant of any tenant and function. Refer to the operations floor plan in Exhibit 'B' for the location of the art gallery and furniture shop.

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Page 5

PART 'A': (CONTINUED)

III. River West and LSL Medical Industries:

Mr. Maiorano, Jr. sold the building to the present owner, Seymour Shiner, in 1988 and the tenants and floor design have since changed. The two story building, 1860 North Elston, is currently occupied by a cabaret designated as River West. The basement is used mainly as storage for old parts. The owner, Richard Post, uses a washer and dryer in the basement for the purpose of cleaning linens. Storage of items does not include any hazardous materials.

The first floor of 1860 North Elston contains one of two serving bars, a sitting area, a band performing area, and a portion of the kitchen. Mr. Post has expanded his utilization of space into 1850 North Elston's one story facility. The other portion of the kitchen now occupies part of the one story building. River West expands further into the adjacent facility with additional seating, the second serving bar, and storage area. The storage area is scheduled to be a banquet hall in the near future. Refer to River West's operations floor plan in Exhibit 'B' for the proper layout.

Seymour Shiner rents the western central portion of 1850 North Elston's one story facility to LSL Medical Industries. A large sterilization machine and water pressurization machine occupy the southwest portion of this space. The rest of the area is used for

IEPA's Review: Aero Plating Company January 27, 1994

Page 6

PART 'A': (CONTINUED)

River West and LSL Medical Industries: (Continued)

storage of products by LSL Medical Industries. Hazardous chemicals are not stored by this company in this section of the facility. Refer to LSL Medical Industries' operations floor plan in Exhibit 'B' for the proper layout.

The remaining southeastern portion of 1850 North Elston's one story building occupies a merchandising company which stores retail goods.

PART 'B'

The second secon

STRUCTURAL INTEGRITY EVALUATION

January 27, 1994

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PART 'B': STRUCTURAL INTEGRITY EVALUATION:

A detailed integrity evaluation at the 1850-1860 N. Elston location was performed by James McElroy, P.E. on December 4, 1993. The following notes and observations were made:

1850 N. Elston, LSL Industries:

LSL Industries, a medical supply company, uses the 1850 N. Elston location as a storage warehouse. The exterior walls are brick, the interior walls are drywall/plaster. The ceiling is 2"x10" wood joists supporting 1"x6" tongue and groove decking. The exterior ends of the joists are supported by the brick walls and load bearing walls of the warehouse. The interior ends of the joists are supported by steel I-Beams, posted on 8" steel lollies. lollies are set into footings beneath the warehouse floor pad. warehouse floor pad is fairly old, and signs of settlement cracking are evident. Nondestructive testing was performed according to the "ACI MANUAL OF CONCRETE PRACTICE, PART 3, Use of Concrete in Buildings- Design, Specifications, and Related Topics, 1988" and the hardened concrete cracking appeared to have been limited to surface spalling and flexural cracks in areas with no expansion joints and flexural cracks in areas with expansion joints. However, only the southwestern section of 1850 N. Elston was used

January 27, 1994

Illinois Environmental Protection Agency Division of Land Pollution Control Bureau of Land 2200 Churchill Road Springfield, IL 62794-9276

ATTN: Mr. Lawrence W. Eastep

P.E., Manager

RE: 0316230004 -- Cook County

Aero Plating Company

ILD005125836 RCRA Closure Log No. 677

Dear Mr. Eastep:

The following section will detail a structural evaluation performed at the Aero Plating facility by Mr. Jim McElroy, P.E., on December 4, 1993. The evaluation was performed to give an indication of the building's structural soundness and to address the possibility of hazardous contaminants migrating through any part of the foundation or floor slab. Photographs of the mentioned areas can be found in Exhibit 'C' of this report.

Respectfully Submitted,

ACES MAINTENANCE

Dan Coyne Environmental Director

January 27, 1994

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PART 'B': (CONTINUED)

as a hazardous waste storage area, and due to the contamination under the slab in this area, remediation is being proposed for

final closure in Part 'C' of this report.

1850 N. Elston, River West Storage

River West, a cabaret and restaurant, uses the 1850 N. Elston

location as a storage facility. The exterior walls are brick, the

interior walls are drywall/plaster. The ceiling is 2"x10" wood

joists supporting 1"x6" tongue and groove decking. The exterior

ends of the joists are supported by the brick walls and load

bearing walls of the storage facility. The interior ends of the

joists are supported by steel I-Beams, posted on 8" steel lollies.

The lollies are set into footings beneath the storage facility

floor pad. River West Storage occupies the northeast corner of

1850 N. Elston, and was a part of the hazardous waste operations

performed by Aero Plating Company. The concrete pad in the area is

in excellent condition and shows no signs of cracks or damage.

1860 N. Elston, River West Basement

River West uses the 1860 N. Elston basement as a storage facility

and an area for washing linens. The basement is divided into two

IEPA's Review: Aero Plating Company January 27, 1994 Page 9

PART 'B': (CONTINUED)

The west room has a troweled plaster rooms, west and east. ceiling, brick and block walls, and a fairly new troweled finish floor. The ceiling is supported by steel I-Beams posted on steel The lollies are supported by cement piers which protrude from the basement floor approximately 20 inches. A drain located in the center of the west room travels to a sump pit located in the east room. From there, the sump pump flushes drainage waters to the north side of the building and into the Cartland Avenue public sewer line. The east room has a drywall ceiling, brick and block walls, and a fairly new troweled finish floor. The ceiling is supported by steel I-Beams posted on steel lollies. The lollies are supported by cement piers which protrude from the basement floor approximately 20 inches. A drain located in the center of the east room travels to a sump pit located in the east end of the room. From there, the sump pump flushes the drainage waters to the east side of the building and into the Elston Avenue public sewer The cement piers in the east room are situated in a tight configuration. Ceiling joists span approximately 8 feet, and the steel beams approximately 10 feet.

Refer to the photographic documentation in Exhibit "C" for these areas.

PART /C/

CLOSURE ACTIVITIES

January 27, 1994

Illinois Environmental Protection Agency Division of Land Pollution Control Bureau of Land 2200 Churchill Road Springfield, IL 62794-9276

Attn: Mr. Lawrence W. Eastep P.E., Manager

Re: 0316230004 -- Cook County Aero Plating Co. **ILD005125836

RCRA Closure Log No. 677

Dear Mr. Eastep:

The following section will detail all closure activities having occurred and closure activities being proposed for final closure of 1850-1860 North Elston Avenue. Closure activities already conducted will include Aero Plating Company's ceasing entity operations and ACES Maintenance's closure operations for the basement of 1860 North Elston. Closure activities being proposed will include additional measures for the basement of 1860 North Elston and operations necessary for Aero Plating Company's hazardous waste storage area in the southwest corner of 1850 North Elston.

Respectfully submitted,

ACES MAINTENANCE

Dan Coyne

Environmental Director

Daniel Toyne

January 27, 1994

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PART 'C': CLOSURE ACTIVITIES

I. Conducted Closure Measures:

Aero Plating Company ceased operations in 1984. In the process of ceasing operations as an electroplating business, all process chemicals were drained from the tanks and placed in drums for sale and disposal as electroplating chemicals. All process equipment was triple rinsed and the acid bearing tanks neutralized with a caustic rinse. One cyanide bearing tank was triple rinsed and treated with sodium hypochlorite to oxidize any residues.

Cleaning procedures in the basement of the two story building, 1860 North Elston Avenue produced nine drums for hazardous waste disposal. These drums were stored on the west side of the first floor of 1860 North Elston. An additional seven drums of sludge from the above ground tank in the southwest area of 1850 North Elston were also disposed of as hazardous waste. In all, a total of 49 drums were disposed of as hazardous waste on September 28th, 1984, to a disposal treatment facility in Emelle, Alabama. Refer to Aero Plating's disposal manifest in Exhibit 'A' for the record of removal from the facility.

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PART 'C': (CONTINUED)

Conducted Closure Measures: (Continued)

ACES MAINTENANCE Basement Closure Activities: In April of 1992, ACES MAINTENANCE conducted closure measures for 1860 North Elston Avenue's basement area. The floor and walls in the basement were sprayed with a high powered industrial washer containing a decontaminated solution. The decontamination solution contained a mixture of trisodiumphosphate (3-oz/gal), a metal complexing agent, calcium hypochlorite (19%), an oxidant used for cyanide breakdown, and water. The solution was adjusted to a pH of approximately five. The floor was cleaned with a decontamination solution using an industrial floor scrubber. After the floor was scrubbed, it was using the rinsed with the high powered sprayer decontamination solution. Staining was observed on the floor after the third rinse had been completed. A scarifier was then used to strip the top layer of concrete from the floor in order to remove the stains. Following scarification, the floor was again scrubbed and rinsed with the decontamination solution. Upon completion, the area was tested using wipe samples for clean closure. One sample each was taken from the representing four walls of the basement. Refer to the analytical results in Exhibit 'D'. The basement floor area was then sealed by applying a layer of concrete and walls sealed by painting their surfaces. All equipment decontaminated after completing cleanup procedures. All resulting

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PART 'C': (CONTINUED)

Conducted Closure Measures: (Continued)

waste waters were analytically tested for suspected hazardous chemicals. Results indicated that contaminants were below clean-up objectives.

II. WORK PROCEDURES:

The following activities must be performed so all surfaces at the Aero Plating Works can be rendered free from hazardous contaminates as described by the USEPA: All windows and doors must be sealed from the outside to prevent migrations of cleaning solution to the exterior of the building. Disconnect main power supply to the building. Cover all electric devices with visqueen to provide a 100% effective water barrier. Plug all drains to prevent any cleaning solution or rinse water from draining into the city sanitation system. Provide properly grounded temporary power and lighting. All surfaces must be visually inspected and any residue adhering to the surfaces must be removed by scraping. Following this, the surfaces must be pressure washed using a tri-sodium phosphate water solution. Proportions shall be as recommended by the manufacturer for removal of nickel, cyanide, hexavalent chromium, and total chromium. All areas then must be triple rinsed.

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PART (C': (CONTINUED)

Work Procedures: (Continued)

All wash solution and rinse water must be collected, stored and tested for hazardous wastes as described by the USEPA and the IEPA regulations. All expendable materials used in this cleanup shall be treated as hazardous waste. Random wipe tests shall then be performed to insure that surfaces are free from hazardous contaminants. If wipe tests prove to be positive, this procedure must be repeated.

After all surfaces have been proven to be clean, a 2" thick 3000 PSI cementatious grout shall be placed on all floors. A steel troweled finish will be provided. A liquid concrete sealer will then be applied immediately following the troweling operation.

III. Soil Sampling Techniques:

Soil samples must be collected in a manner which causes the least disturbance to the sample. Sampling technique will be dependent upon site specific conditions at closure. In order to maintain consistency, use the same sampling technique for each sample. When possible, the same person will collect all samples at a particular site to reduce variability in sample results. This will help to ensure that data obtained is representative of the closure site and not a result of erratic sampling technique.

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PART 'C': (CONTINUED)

Soil Sampling Techniques: (Continued)

The number of samples required when conducting closure is dependent

upon the size of the excavation. Sampling is required to

demonstrate the condition of soil remaining in the ground.

Representative samples will have to be collected from the

excavation side walls and floor. Samples from the side walls and

floor must be grab samples to determine if the cleanup objectives

have been met.

For grab samples, soil is not combined with other locations. Grab

samples can indicate the exact area where contamination was

detected. This makes it possible to continue the investigation

only in the affected area. Composite samples are not to be

collected for purposes of complying with the closure assessment

requirements.

All samples shall be properly labeled. Sample labels shall

indicate the date the sample was taken, a sample ID standard, site

location, and other comments as conditions warrant.

Soil Sampling Methods

Whenever hand tools are used to collect samples, the first three to

four inches (as a minimum, unless otherwise noted) of soil must be

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PART 'C': (CONTINUED)

Soil Sampling Techniques: (Continued)

scraped away immediately before sampling so that the sample is

collected from a previously unexposed soil area.

Sampling equipment to collect and contain samples should be

disposable or easily decontaminated. All soil sampling tools must

be thoroughly cleaned between all sampling points using

water/detergent solutions, methanol, or other appropriate solvents.

Failure to decontaminate sampling equipment between samples may

result in cross contamination of samples. Decontamination between

sampling events (projects) is important to ensure the next site

does not show a false positive. Sampling items should be easy to

operate.

Sample Containers for Laboratory Analysis

Samples shall be collected in glass or inert synthetic containers

obtained from or approved by the certified laboratory which will

analyze the samples. Polyethylene bags are not to be used for

laboratory samples.

All sample containers shall have Teflon or equivalent lined caps.

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PART 'C': (CONTINUED)

Soil Sampling Techniques: (Continued)

Sample containers shall be filled to the top such that no headspace

remains, unless otherwise noted. The use of "wide mouth" vials is

highly recommended.

Sample Handling

Seal and label samples prior to collection or immediately following

collection. Chill samples immediately using quantities of ice,

"blue ice," or equivalent. Note: Closure assessment documentation

requires analytical laboratories to report sample temperatures.

Improper storage resulting in sample warming could result in

rejection of report results.

Chain of Custody, Location sheet, and all other related paperwork

shall accompany the samples from collection throughout analysis.

Ship samples to analytical laboratory as soon as possible. Do not

allow stored samples to exceed maximum holding time.

Sampling Backfill

If native soil is absent from the soil sample locations outlined

above, then sample the backfill provided it is coarse sand or

finer. If pea gravel or coarser material extends more than three

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PART 'C': (CONTINUED)

Soil Sampling Techniques: (Continued)

feet beneath the prescribed sample locations, excavate to native

soil for sampling. If groundwater is encountered in gravelly

backfill, excavate laterally to sample native soil from the side

walls of the excavation just above the water level.

Obvidus Contamination

If free product, strong odors, stained soil or backfill, or other

conditions make it obvious that a release has occurred, do not

complete soil sampling. Report the release immediately and collect

one sample of contaminated soil for laboratory analysis to provide

confirmation of the release. Collect the sample from an area that

is representative of the contamination. Do not collect a composite

sample from several locations.

SAMPLE COLLECTION PROCEDURES

Collect soil samples in accordance with the soil type, substance,

and analytical parameters and methods. Sample collectors should

observe all standard scientific and industry practices. The

following sampling procedures are provided as quidance:

1. Identify sample collection points based on soil sample

locations specified above. Assign sample ID numbers at this

time or at the time of collection.

IEPA's Review: Aero Plating Company January 27, 1994

Page 19

PART 'C': (CONTINUED)

soil Sampling Techniques: (Continued)

using a metal or plastic plunger.

- e. split spoon samplers consist of a metal cylinder split longitudinally and threaded on both ends. They are most commonly used with borings but can be used to sample soil directly.
- f. Shelby tubes are thin-walled metal tubes that are driven into the formation usually using a drilling rig.
- g. Gloves are recommended for personal protection from exposure to contaminants. Do not wear work gloves while collecting samples because they cannot be adequately decontaminated.
- 5. Collect at least one soil sample from each location from a freshly exposed surface. Remove at least 18" of soil from the immediate surface area where the sample is to be taken. Work quickly and minimize agitation of the soil to prevent loss of volatile contaminants. Collect at least 25g of each soil type for sampling. Fill sample jars completely with soil leaving no headspace. Do not combine soil from several locations into one sample because it decreases the specificity of the sample and increases the potential for volitization.
- 6. Seal the sample, making sure that no soil particles are present on the mouth of the jar or cap. Also sweep the inside

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PART 'C': (CONTINUED)

Soil Sampling Techniques: (Continued)

- 2. Identify the type of analysis for each sample location. Collect BETX samples in wide mouth 60 ml VOC vials. Collect TCLP samples in wide mouth 60 ml VOC vials. Collect PNA samples in 8 oz. wide mouth bottles. All sample jars should have Teflon lined caps.
- 3. Gain access to the soil sample locations.
- 4. Use appropriate sampling equipment to collect samples.

 Sampling equipment should be capable of rapidly collecting samples with a minimum of atmospheric exposure.
 - a. Hand augers are limited to use in unconsolidated sediments and are particularly useful in sandy materials but tend to be impractical in dense clays or stony materials.
 - b. Trowels can be used to collect soil samples from in place or from the backhoe bucket.
 - c. A large (30ml) plastic syringe with the end cut off can be used to collect soil samples with a minimum of disturbance to sands and silts.
 - d. A metal pipe can be used to collect soil samples with a minimum disturbance in heavy clays. The pipe can be pounded into the soil and the resulting sample extruded

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Page 19

PART 'C': (CONTINUED)

Soil Sampling Techniques: (Continued)

using a metal or plastic plunger.

- e. split spoon samplers consist of a metal cylinder split longitudinally and threaded on both ends. They are most commonly used with borings but can be used to sample soil directly.
- f. Shelby tubes are thin-walled metal tubes that are driven into the formation usually using a drilling rig.
- g. Gloves are recommended for personal protection from exposure to contaminants. Do not wear work gloves while collecting samples because they cannot be adequately decontaminated.
- 5. Collect at least one soil sample from each location from a freshly exposed surface. Remove at least 18" of soil from the immediate surface area where the sample is to be taken. Work quickly and minimize agitation of the soil to prevent loss of volatile contaminants. Collect at least 25g of each soil type for sampling. Fill sample jars completely with soil leaving no headspace. Do not combine soil from several locations into one sample because it decreases the specificity of the sample and increases the potential for volitization.
- 6. Seal the sample, making sure that no soil particles are present on the mouth of the jar or cap. Also sweep the inside

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PART 'C': (CONTINUED)

Soil Sampling Techniques: (Continued)

of the lid if you put it down. A good sample seal is necessary to prevent loss of volatile contaminants.

- 7. Pack samples for lab analysis in ice immediately. Keep samples at or below 4 degrees Celsius after collection and prior to analysis.
- 8. Collect an additional sample for field screening (if used)
 from each soil sample location. DO NOT PERFORM HEADSPACE
 ANALYSIS ON SAMPLES COLLECTED FOR LAB ANALYSIS.
- 9. Collect an additional sample for dry weight determination at each sampling location.
- 10. Collect grab samples for field identification of soil type.
- 11. Properly label each sample collected. Follow proper sample identification procedures.
- 12. Look at the sample for the presence of obvious contamination or staining. Identify the soil texture using the USCS classification and note soil color. Note any obvious sample odor. Also note the moisture content (dry, damp, moist, saturated). Record observations in the field notebook.
- 13. Decontaminate sample collection equipment between each sampling location. Scrub sampling tools in detergent or

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PART 'C': (CONTINUED)

Soil Sampling Techniques: (Continued)

solvent solution, rinse (repeatedly) in pure water, wipe dry with paper towel or allow to air dry. Use rinse water that is distilled or obtained from a source that is known to be uncontaminated. Wash bare hands or safety gloves in addition to the sampling tools. Change disposable gloves (if used) between each sampling location. Decontaminate syringes between each sample location or use a different syringe at each location. Decontaminate plastic syringes, if reused, using soap and water only because solvents can cause them to leach phthalates.

IV. Proposed Closure Measures:

1860 N. Elston Basement

Closure measures conducted in April of 1992 removed all contamination from the basement surfaces of 1860 North Elston as can be attested to by ACES Maintenance's closure testing in the analytical section of Exhibit 'D'. Prior subsurface investigations of the soil beneath the basement floor has documented the soil as being contaminated. In addition, the agency has recommended that the facility at 1850-1860 North Elston be completely reevaluated with more subsurface soil borings. These analytical results from the subsurface investigation conducted on

IEPA's Review: Aero Plating Company January 27, 1994

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PART (C': (CONTINUED)

Proposed Closure Measures: (Continued)

December 23rd, 1993, demonstrate that contamination does in fact exist beneath the basement floor.

ACES Maintenance cleaned the facility's basement surface area of all contamination when cleaning activities were conducted in April of 1992. Analytical results of closure wipe tests from this cleaning showed contamination below agency thresholds. These measures were carried out in the recognition that contaminated soil beneath the floor's surface would remain in place with a conditional letter of clean being provided for this area. standard practice in Illinois Environmental Protection Agency regulations to waive the removal of contaminated soil when remediation techniques jeopardize the facility's structural support. Viewing photographs of the basement in Exhibit 'C' shows the structural support for the two story building. Two rows of columns running east/west support the facility in the basement width of only 24 feet. As a result, there is approximately only eight feet of width between any two supports of the four that This is calculated by the distance from one wall's foundation to a column support to another column support and then to the other wall's foundation. If remediation would be attempted, only approximately three vertical feet could be safely removed

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PART 'C': (CONTINUED)

Proposed Closure Measures: (Continued)

without jeopardizing the structural support. This is determined from structural engineering standards that require a one to one slope away from supporting structures to ensure the integrity of the support during excavation. If conducted, this removal would account for only a small portion of the contaminated soil existing beneath the floor. The financial endeavor and safety concerns of the facility and labor involved do not appear to warrant any remediation activity. Therefore, the recommendation is given that the agency provide the owner, Seymour Shiner, a conditional letter of clean that would grant final closure measures for 1860 North Elston Avenue's basement area with no further action conducted.

Hazardous Waste Storage Area Closure: Aero Plating stored sludge from the plating line and hazardous waste by-products from the waste water pretreatment process in a tank located in the southwest area of 1850 North Elston. Prior subsurface investigations performed by both Scientific Control Laboratories, Inc. and ACES MAINTENANCE in this area have found the soil to be contaminated. This area is currently being rented to LSL Medical Industries by Mr. Shiner. There exists in this old hazardous waste storage area an elaborate sterilizer and water treatment machine used in the sterilizing process. Mr. Shiner intends to move this tenant out so IEPA's Review: Aero Plating Company January 27, 1994 Page 24

PART 'C': (CONTINUED)

Proposed Closure Measures: (Continued) cleanup of the soil can occur.

ACES MAINTENANCE proposes that remediation of contaminated soil be excavated from this area and disposed of at an approved landfill. Excavation of soil is recommended in this area because structural support does not provide the barrier to removal and safety hazards it does in the basement of 1860 North Elston. Removal of soil will be manifested off-site in licensed waste haulers to the designated landfill. Sampling at the end of remediation will provide analytical results that document the area's clean closure. Sampling parameters will include testing for chromium, nickel and cyanide. Once analytical results are provided, the excavated hole will be back filled with clean fill and concrete laid in for resurfacing.

PART 'D'

SUMMARY AND CONCLUSIONS

January 27, 1994

Illinois Environmental Protection Agency Division of Land Pollution Control Bureau of Land 2200 Churchill Road Springfield, IL 62794-9276

Attn: Mr. Lawrence W. Eastep P.E., Manager

Re: 0316230004 -- Cook County
Aero Plating Co.
LID005125836
RCRA Closure
Log No. 677

Dear Mr. Eastep:

The following section will summarize closure operations conducted to date and provide conclusions for the final closure status Seymour Shiner is seeking for his facility located at 1850-1860 North Elston Avenue. A professional engineers certification from James McElroy is also provided in connection with closure activities having taken place and certifying recommendations for future closure activities conducted by ACES Maintenance.

Respectfully submitted,

ACES MAINTENANCE

Dan Coyne

Environmental Director

Daniel Ti Coyne

January 27, 1994

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PART 'D': SUMMARY AND CONCLUSIONS

Aero Plating Company began closure activities in 1984 when Louis J. Maiorano, Jr. disposed of hazardous wastes resulting from normal company operations and from ceasing company operations in 49 drums to a treatment facility in Emelle, Alabama. Mr. Maiorano, Jr. hired Scientific Control Laboratories, Inc. to aid in the closure of his facility at 1850-1860 North Elston Avenue. Subsurface investigations conducted by Scientific Control Laboratories, Inc. identified that contamination exists beneath facility grounds. Mr. Maiorano should have taken responsibility in cleaning up his contaminated site with the help of Scientific Control Laboratories. Instead, he elected not to follow Illinois Environmental Protection Agency guidelines for closure of his site and decided to sell the property.

The facility has been sold to the current owner, Seymour Shiner, who has since hired ACES MAINTENANCE to help in achieving closure. Subsurface investigations conducted by ACES MAINTENANCE has also identified contamination below the facility's floors. In an effort to clean the basement of 1860 North Elston Avenue's basement, the floor and wall surfaces were decontaminated and cleaned. Because remediation of soil in this area would jeopardize the structural integrity of the building, incur unreasonable financial costs, and

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PART 'D': (CONTINUED)

cause personal safety concerns, a recommendation of no further

action is being made for final closure.

Subsurface investigations on December 23rd, 1993, involved the

drilling of borings in the old waste water pretreatment area of

Aero Plating Company. River West is presently the tenant of this

area under Mr. Shiner's ownership. The owner of River West, Mr.

Richard Post, wishes to expand operations by placing a future

banquet hall in this area. Analytical results from subsurface

sampling shows that no contamination exists. Refer to the recent

subsurface investigation in Exhibit 'C'. With no signs of

contamination in the north and central portions of 1850 North

Elston Avenue, a recommendation for final closure be given by the

agency to this respective area.

The final area of concern is in the southwest area of 1850 North

Elston Avenue. This was where Aero Plating Company stored their

hazardous waste in an above ground tank from the waste water

pretreatment area and sludge from the plating line. Subsurface

investigations have identified contamination in the soil.

Recommendation is given that Mr. Shiner excavate the soil and have

it manifested off-site to a landfill or have it incinerated, if

necessary. Once closure sampling identifies the site as being

January 27, 1994

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PART 'D': (CONTINUED)

clean, the excavated hole will be backfilled with clean fill.

After remediation efforts have been completed, recommendation is being made for closure from the agency.

These protocols have been described above in an attempt to obtain final closure documents from the Illinois Environmental Protection Agency for Seymour Shiner's 1850-1860 North Elston Avenue facility.

PROFESSIONAL ENGINEERS CERTIFICATION FORM

IEPA's Review: Aero Plating Company January 27, 1994

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Date

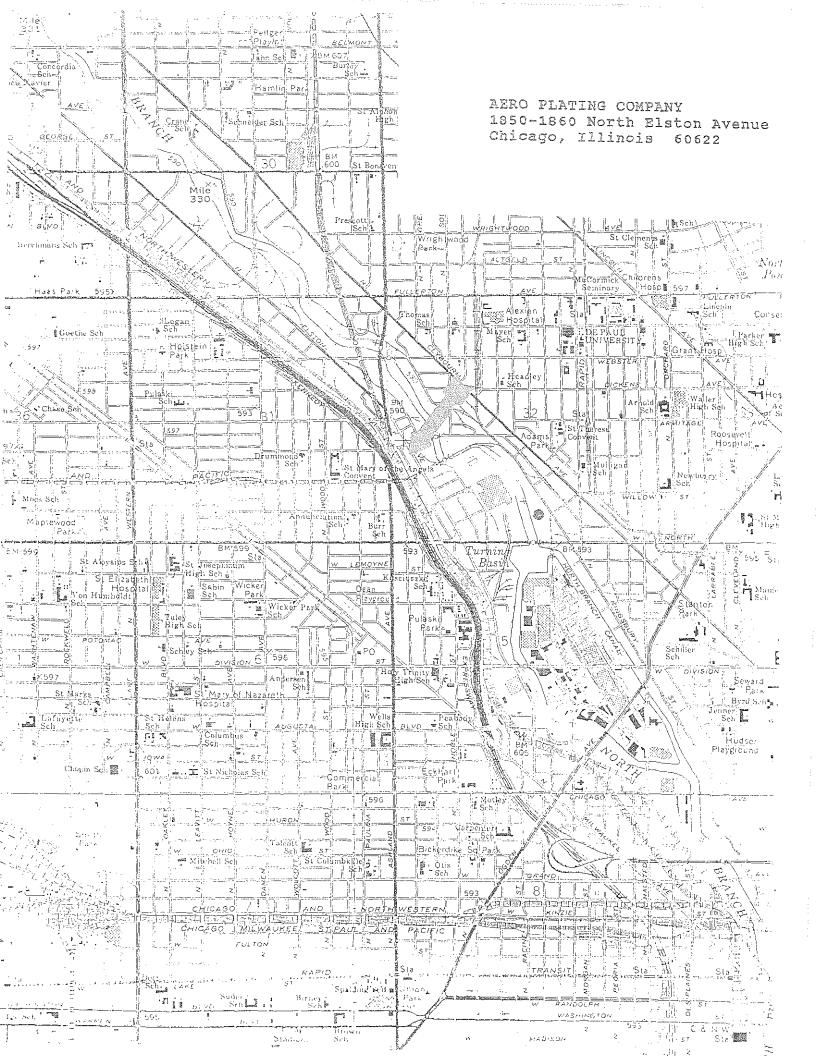
CLOSURE CERTIFICATION STATEMENT

The hazardous waste management units at the 1850-1860 North Elston Avenue facility described in this document have been closed in accordance with the specifications in the approved closure plan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

<u>II-005/25836</u> USEPA ID Number	Aero Plating Company Facility Name
Signature of Owner/Operator	DANIBO TICOTNE LEST Name and Title For CHONE
Signature of Registered P.E.	James A. Mc Elroy Name of Registered P.E. and Illinois Registration Number

EXHIBIT 'A'

TOPOGRAPHICAL MAPS



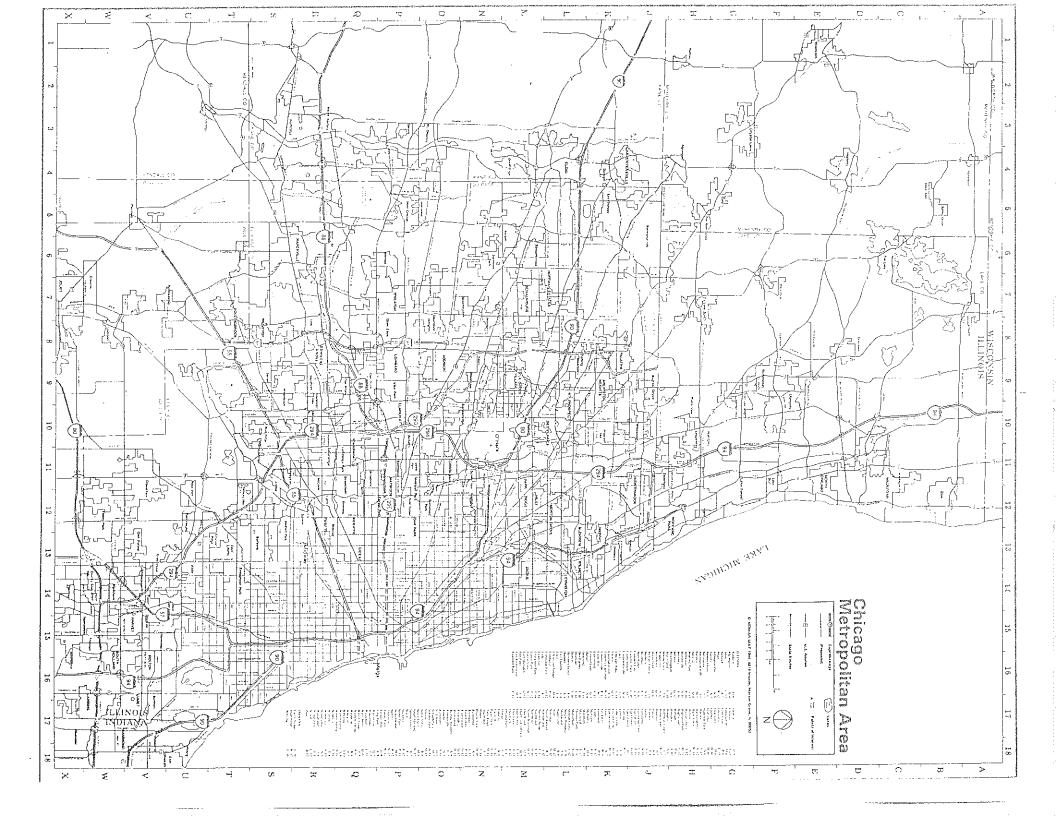
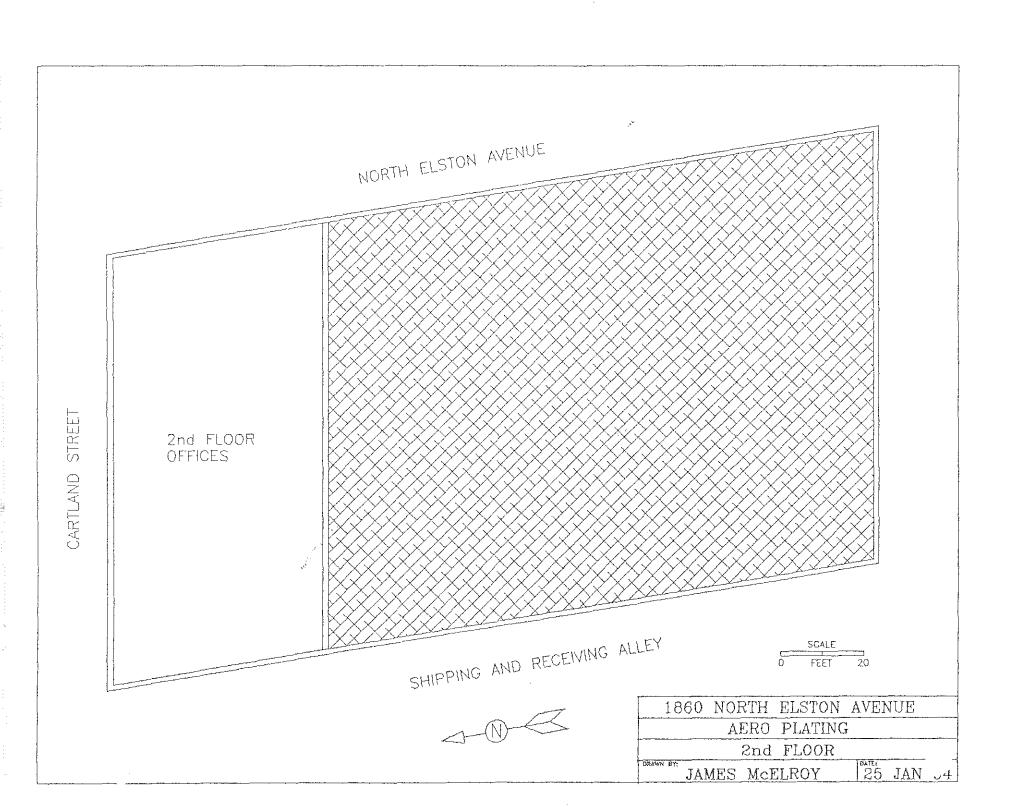
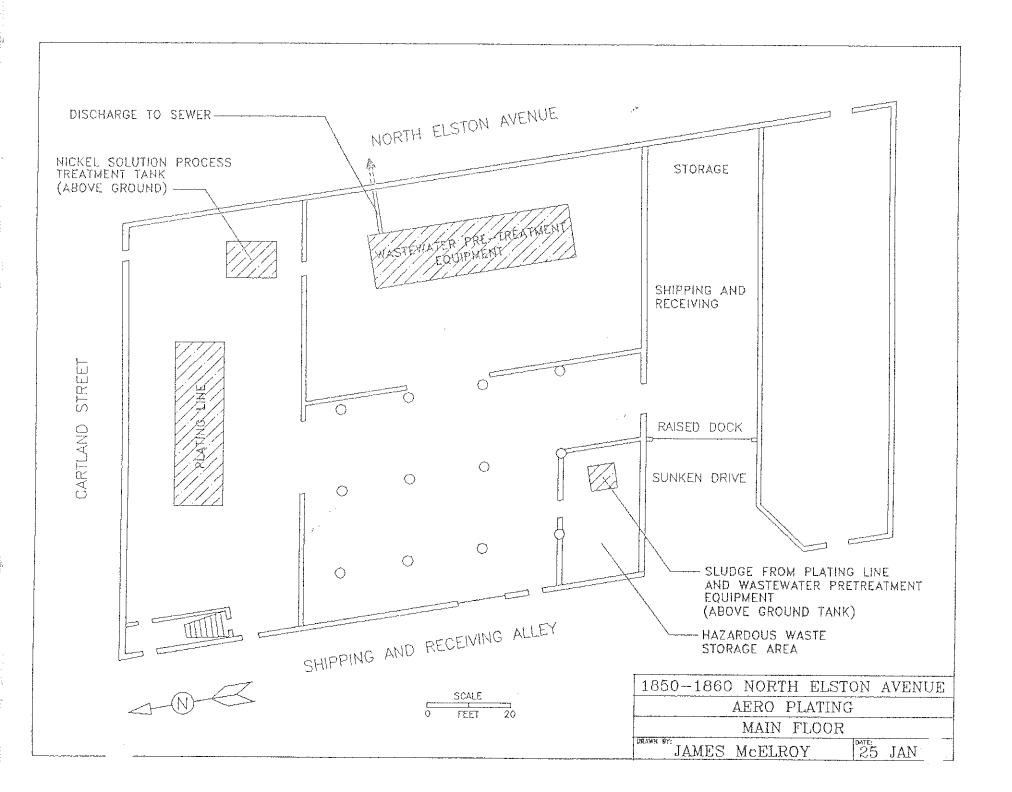


EXHIBIT 'B'

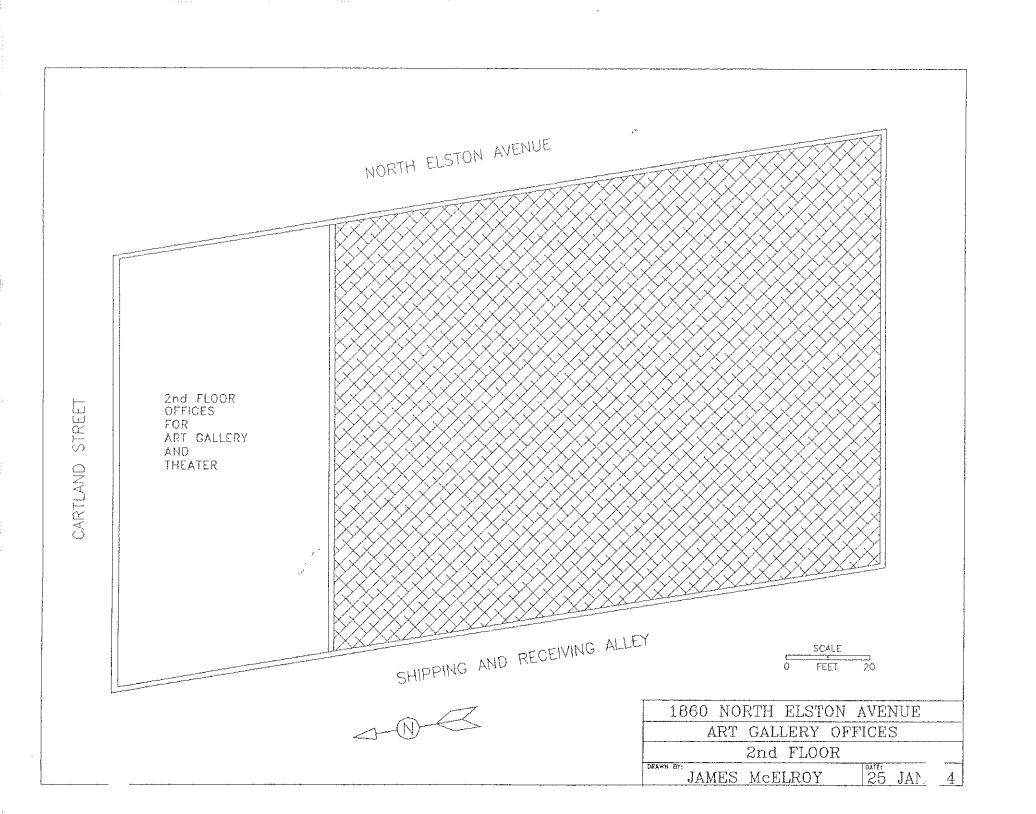
FACILITY AND REFERENCE DRAWINGS

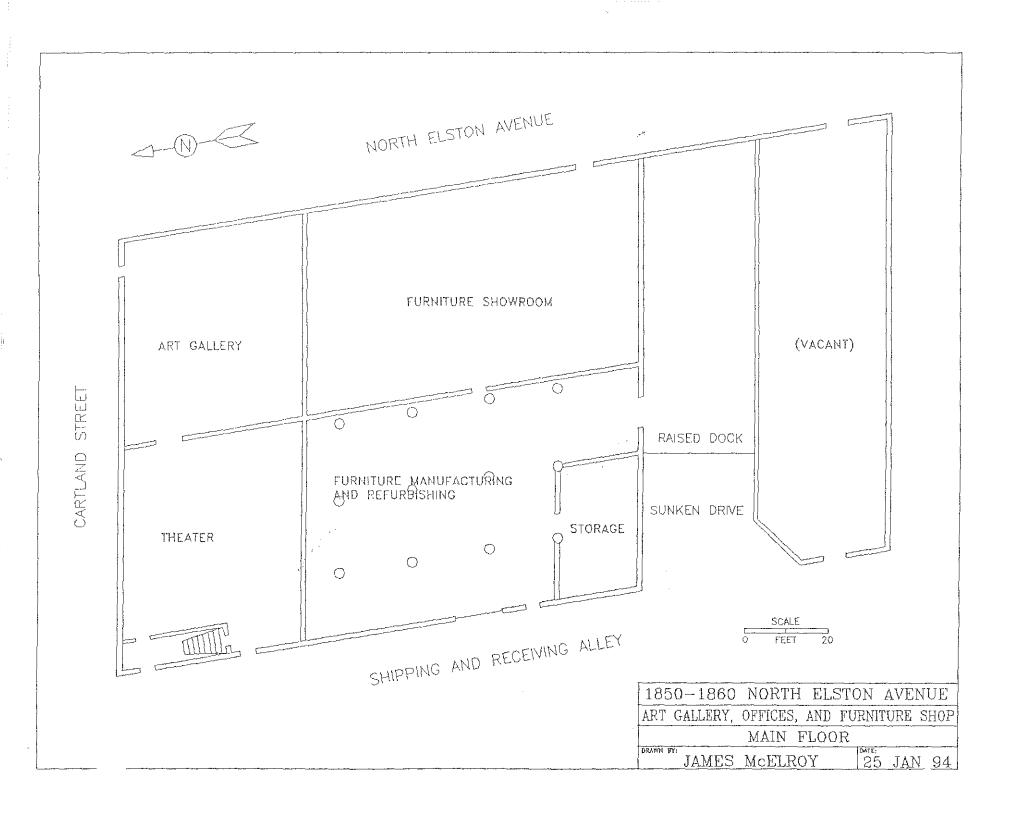
PERO PLATING COMPANY OPERATIONS



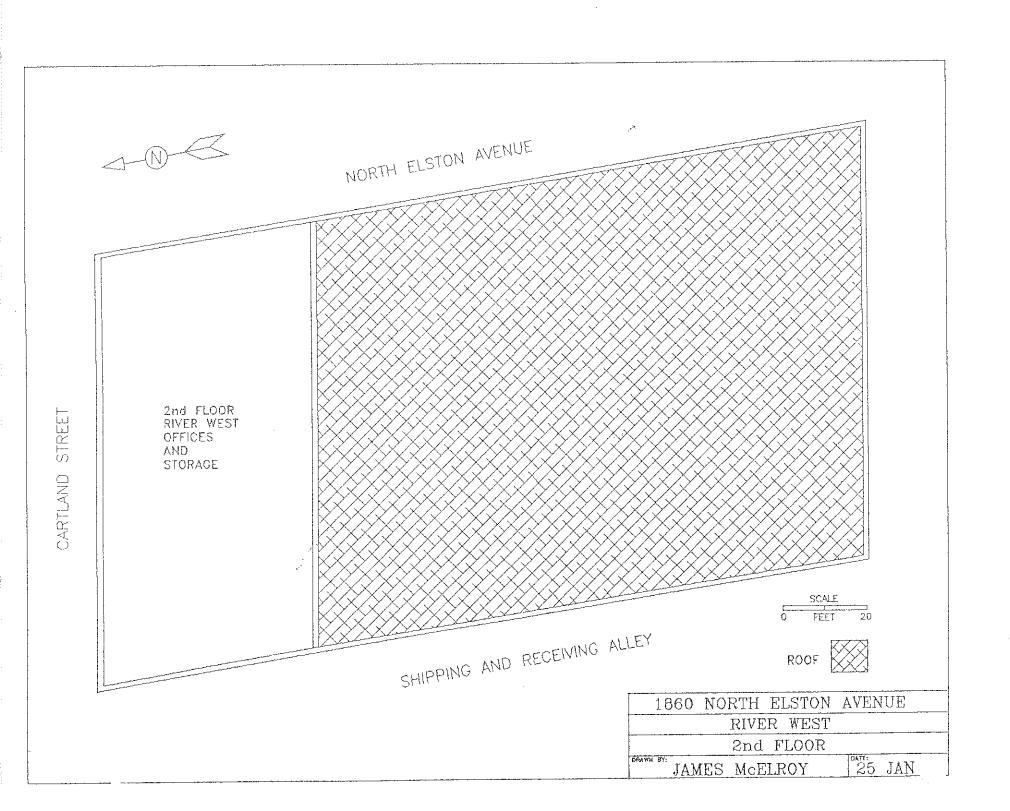


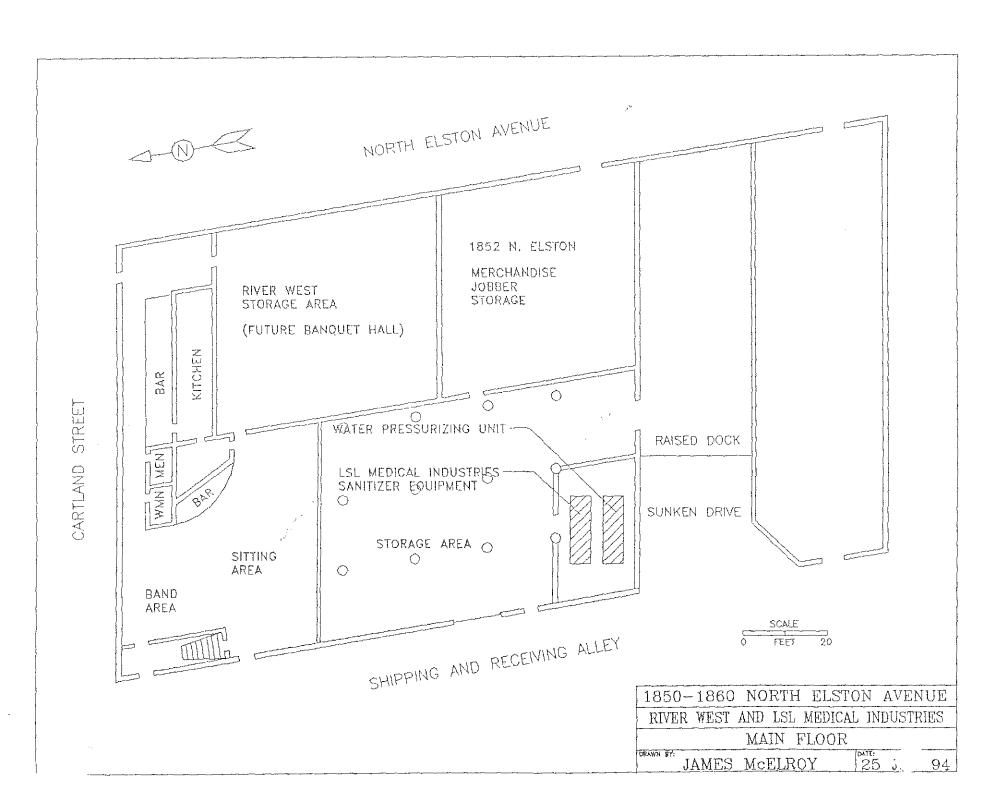
YET GALLERY, OFFICES, & FURNITURE SHOP OPERATIONS



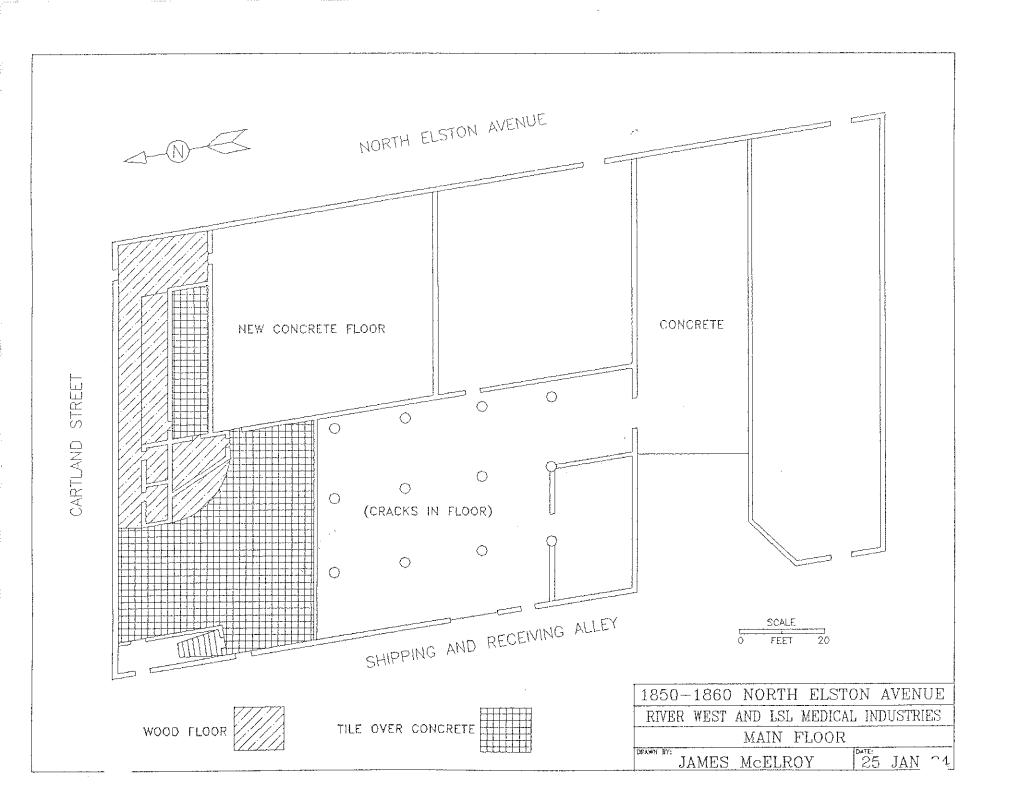


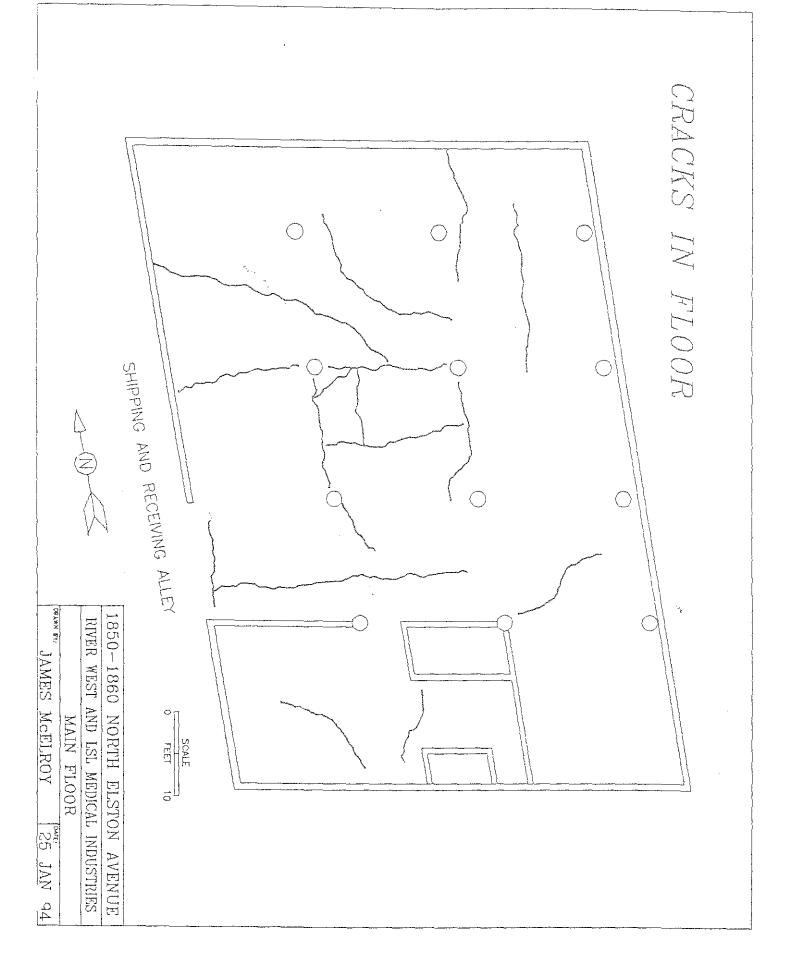
RIVER WEST & LSL MEDICAL INDUSTRIES OPERATIONS



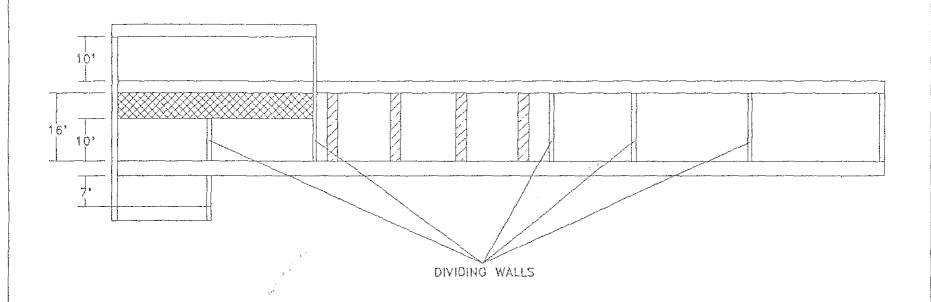


STRUCTURAL INTEGRITY DRAWINGS





CROSS SECTIONAL VIEW FACING EAST



COLUMNS



DROP CEILING

SCALE 0 FEET 20

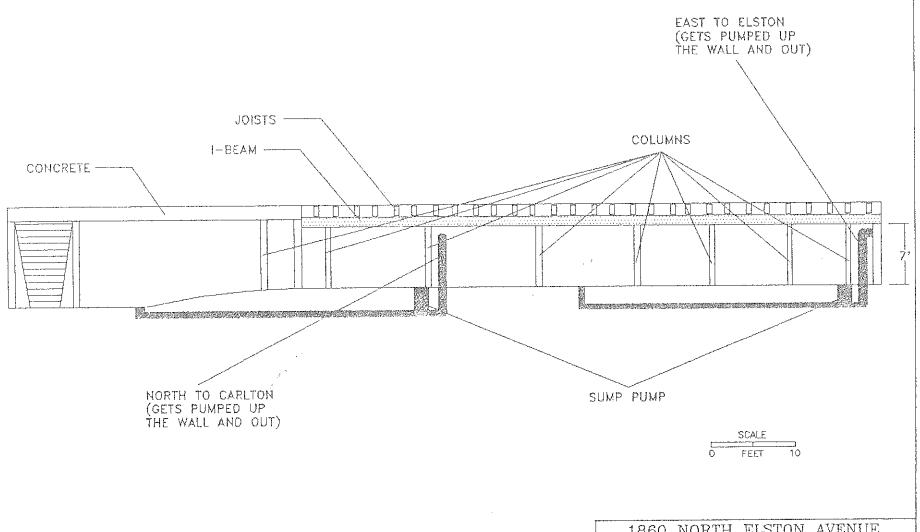
1850-1860 NORTH ELSTON AVENUE
RIVER WEST & LSL MEDICAL INDUSTRIES
MAIN FLOOR

MAIN FLOOR

JAMES McELROY

25 JAN 1

CROSS SECTIONAL VIEW FACING NORTH



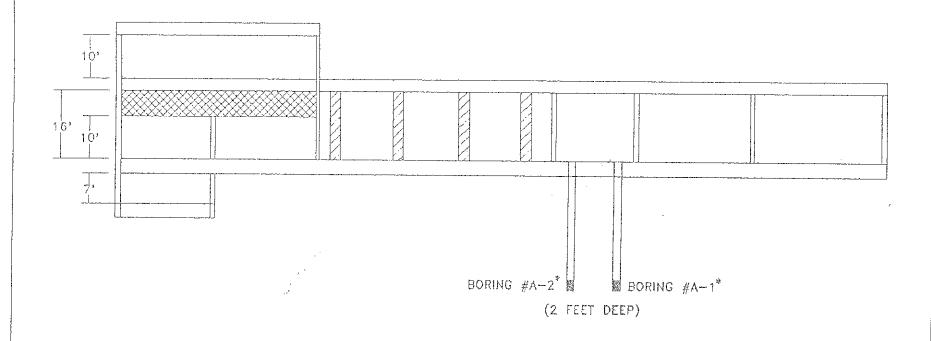


DRAINAGE SYSTEM

1860 NORTH ELSTON AVENUE
RIVER WEST
BASEMENT
BASEMENT
JAMES McELROY
25 JAN

PAST SUBSURFACE INVESTIGATION BORINGS

CROSS SECTIONAL VIEW FACING EAST



COLUMNS

DROP CEILING

*SAMPLE DEPTHS NOT TO SCALE 1850-1860 NORTH ELSTON AVENUE RIVER WEST & LSL MEDICAL INDUSTRIES

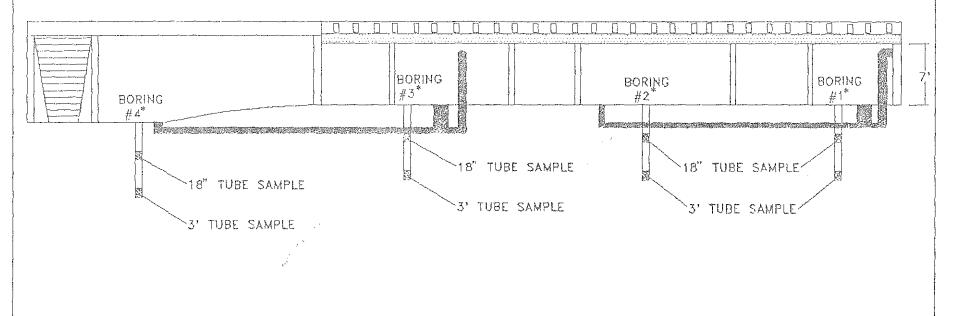
MAIN FLOOR

JAMES McELROY 25 JAN S

12/23/93 SUBSURFACE INVESTIGATION BORINGS

ACE'S MAINTENANCE SUBSURFACE INVESTIGATION 12/23/93 NORTH ELSTON AVENUE BORING #1 BORING #2 BORING #3 SHIPPING AND RECEIVING ALLEY BORING #4 SOIL, ROCK, ETC. 1860 NORTH ELSTON AVENUE RIVER WEST BASEMENT 25 JAN 9 JAMES McELROY

CROSS SECTIONAL VIEW OF BORINGS #1, #2, #3, AND #4 VIEW LOOKING NORTH



*DEPTH OF BORINGS NOT TO SCALE





1860 NORTH ELSTON AVENUE

RIVER WEST

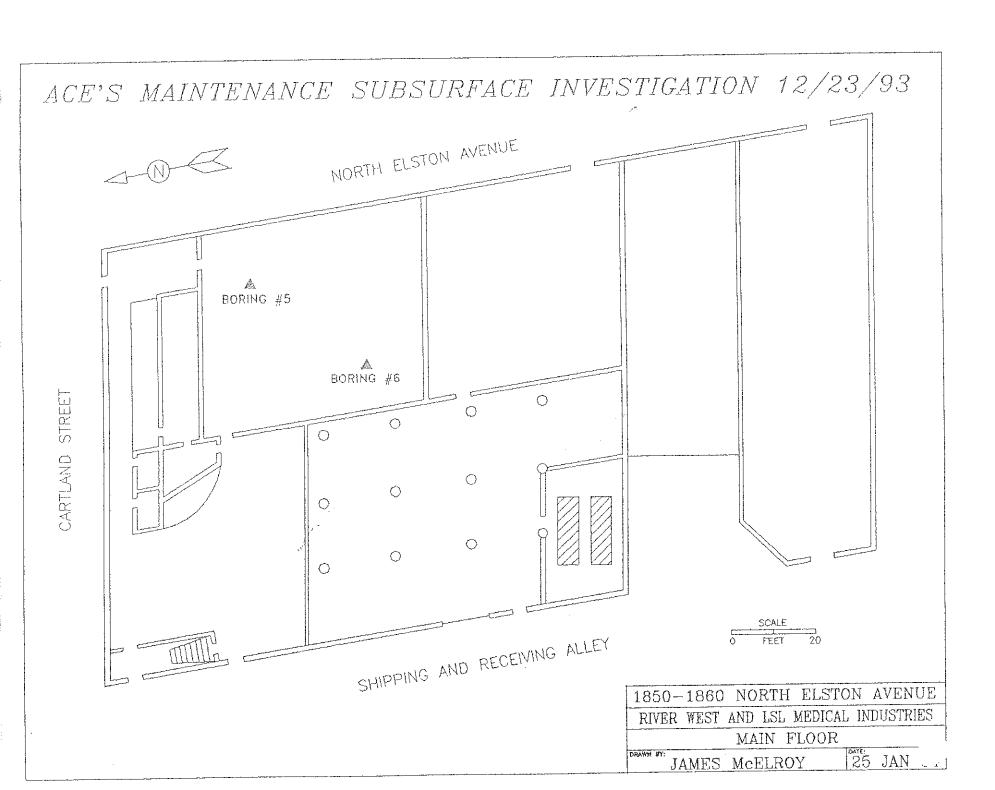
BASEMENT

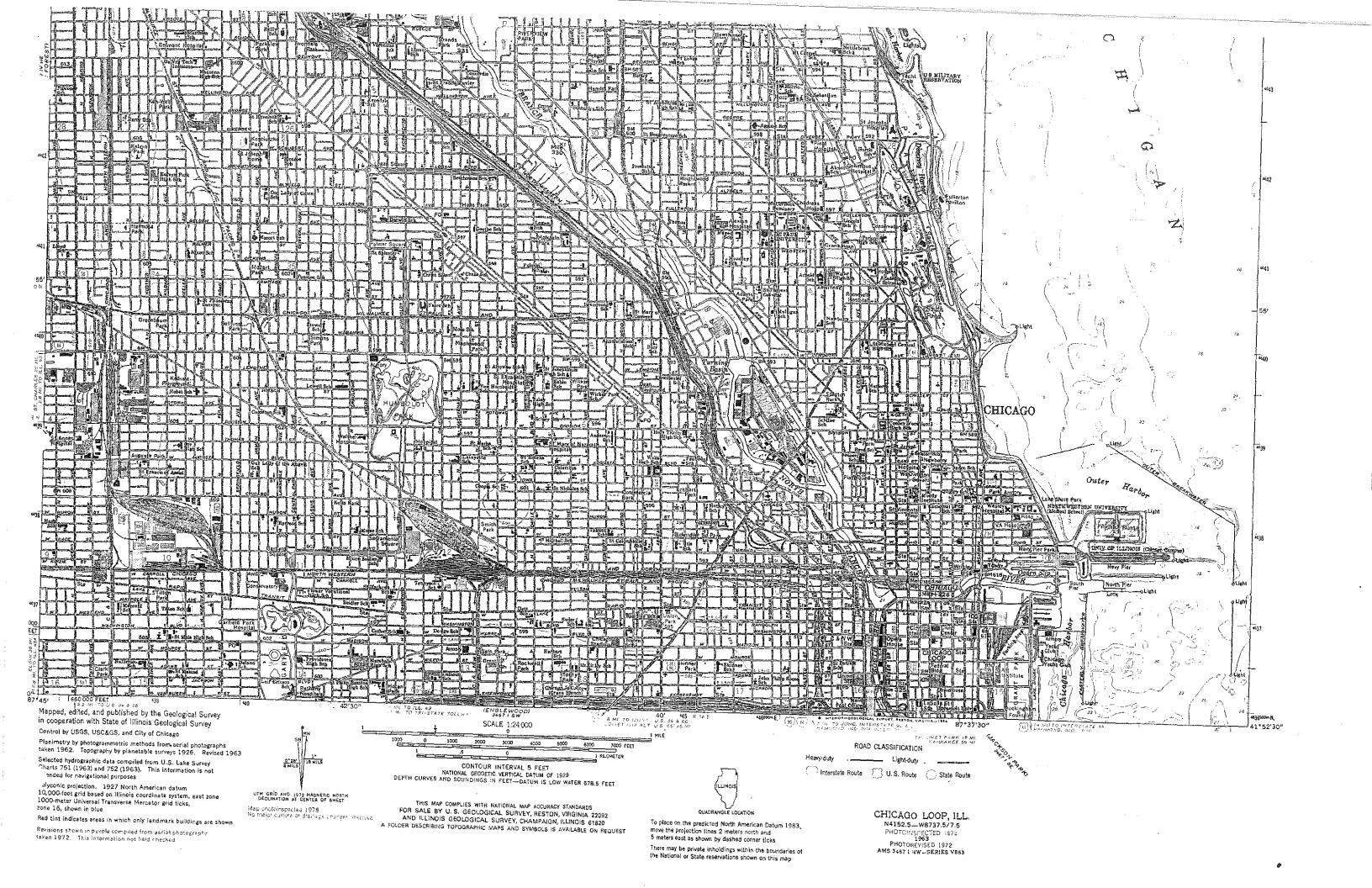
BASEMENT

JAMES MCELROY

25 JAN

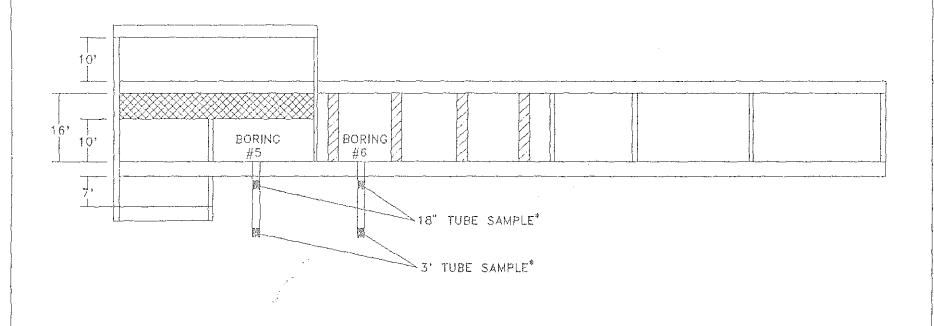
L





UNITED STATES DEPARTMENT OF THE INTERIOR GEOLOGICAL SURVEY CHICAGO LOOP QUADRANGLE ILLINOIS-COOK CO.
7.5 MINUTE SERIES (TOPOGRAPHIC) 1690 000 FEET 87°37'30" -(11) [24 A THE TANK (<u>/e</u> . CHON RESERVATION

CROSS SECTIONAL OF BORINGS #5 AND #6 VIEW LOOKING EAST



COLUMNS

DROP CEILING

*SAMPLE DRAWINGS NOT TO SCALE



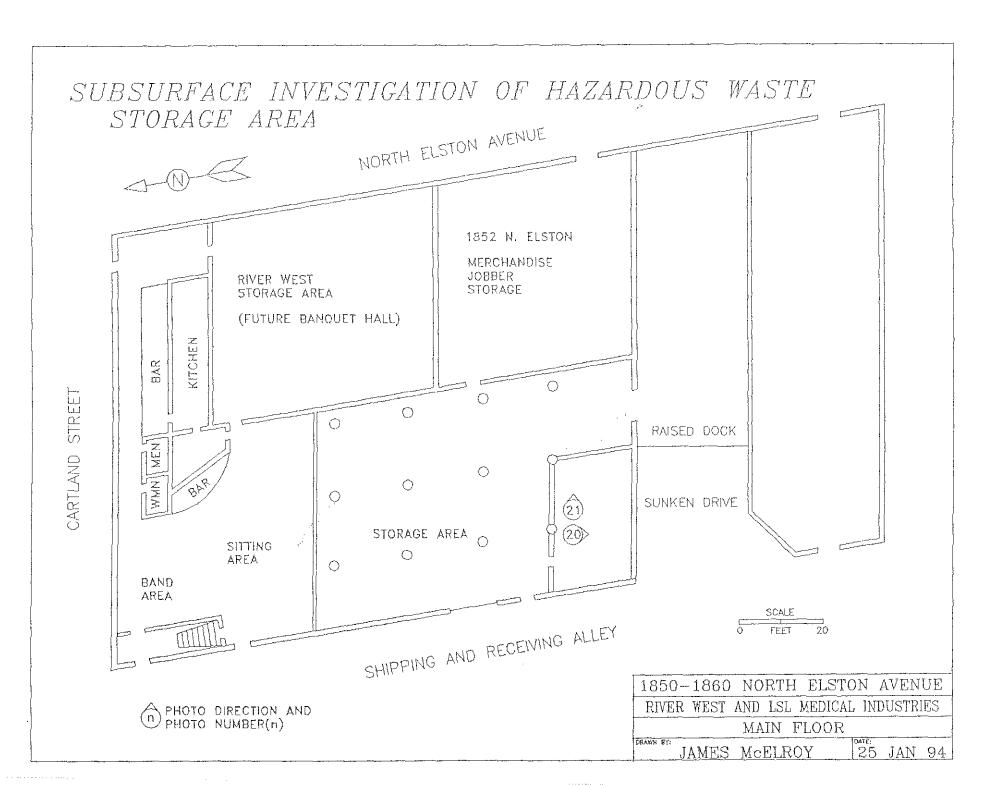
1850-1860 NORTH ELSTON AVENUE
RIVER WEST & LSL MEDICAL INDUSTRIES
MAIN FLOOR

DATE:
JAMES MCELROY 25 JAN 5-2

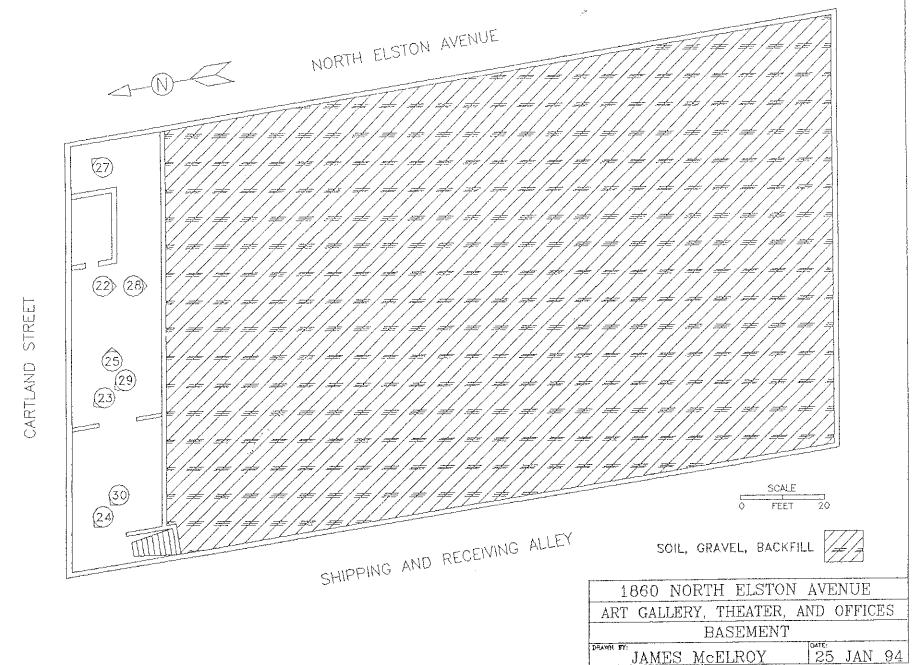
1860 N. ELSTON AVENUE BASEMENT CLOSURE WIPE LOCATIONS

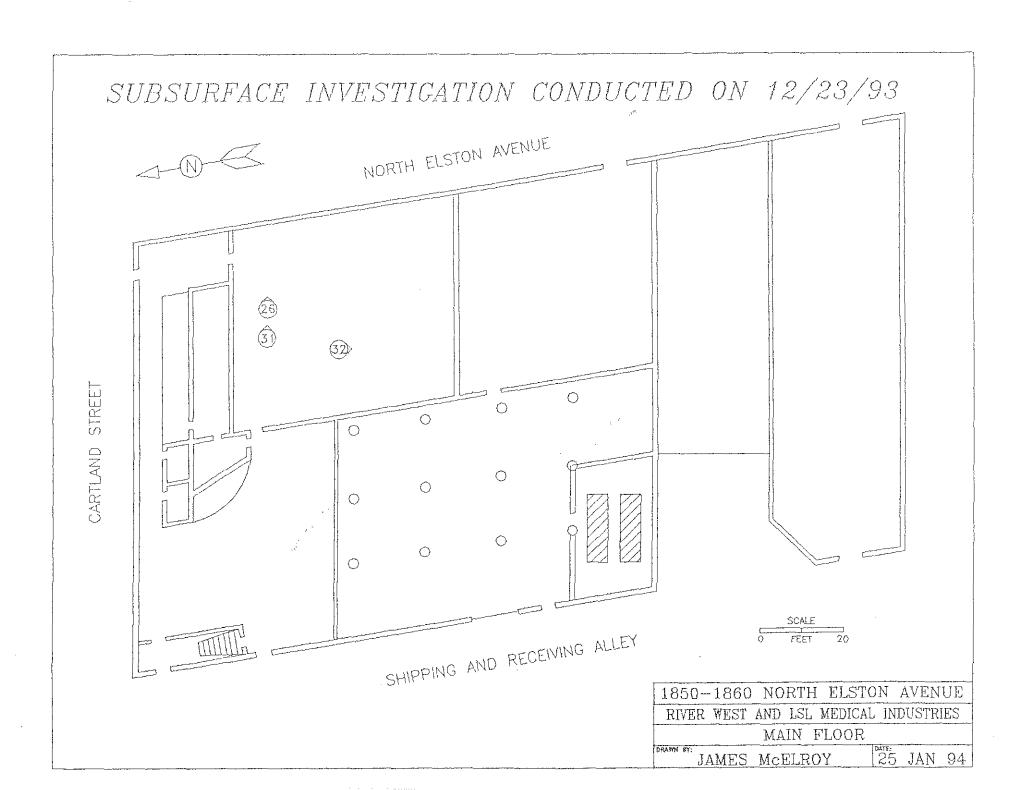
ACES MAINTENANCE CLOSURE WIPE SAMPLING NORTH ELSTON AVENUE CLOSURE WIPE SAMPLES STREET CARTLAND SHIPPING AND RECEIVING ALLEY SOIL, ROCK, ETC. 1860 NORTH ELSTON AVENUE RIVER WEST BASEMENT 25 JAN 94 JAMES McELROY

PHOTOGRAPHIC DOCUMENTATION REFERENCE DRAWINGS



SUBSURFACE INVESTIGATION CONDUCTED ON 12/23/93





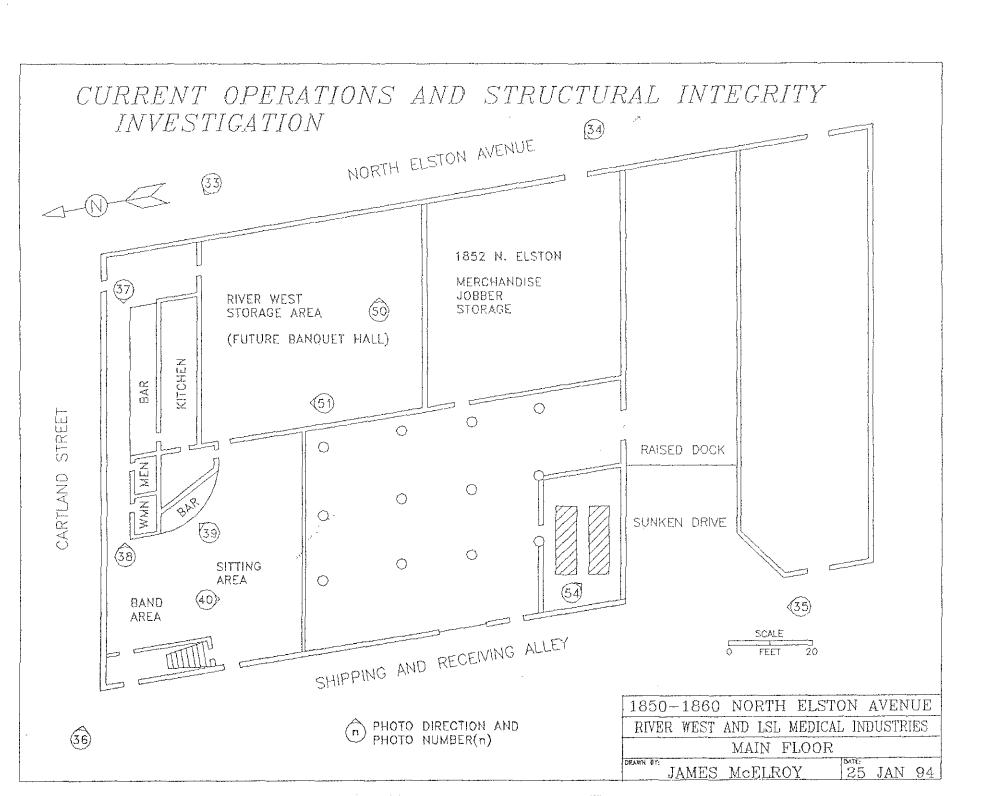


EXHIBIT 'C'

PHOTOGRAPHIC DOCUMENTATION

1860 NORTH ELSTON AVENUE BASEMENT CLEAN-UP OPERATIONS

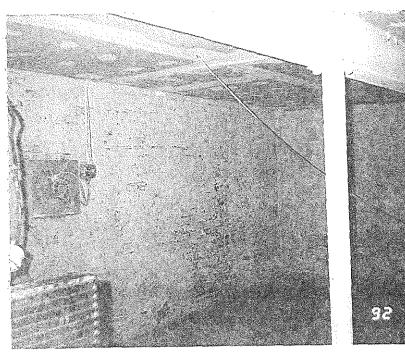
PHOTOLOG DATA SHEET

Project:
Aero Plating
Company
Location:
1860
North Elston
Photo #:
01

View Looking: Southwest

Taken By: Dan Coyne

Date:
 03/25/92





Notes: Preexisting contamination on the south and west walls of the basement in 1860 North Elston Avenue's basement.

Project:
Aero Plating
Company
Location:
1860
North Elston
Photo #:
02

View Looking: Southwest

Taken By: Dan Coyne

Date: 3/25/92



Notes: Close-up of previous picture. Wall deterioration shows presence of Nickel contamination.

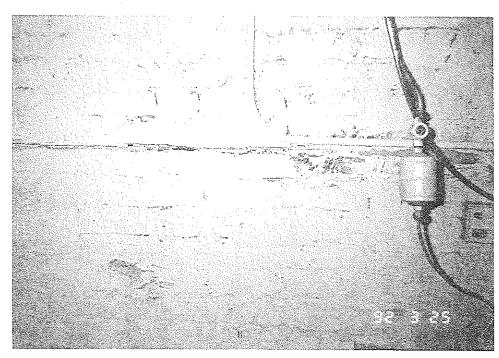
PHOTOLOG DATA SHEET

Project:
Aero Plating
Company
Location:
1860
North Elston
Photo #:
03

View Looking: Northeast

Taken By: Dap Coyne

Date: 3/25/92



Notes: Nickel contamination on the northeast corner basement walls prior to clean-up.

Project:
Aero Plating
Company
Location:
1860
North Elston
Photo #:
04

View Looking: Northwest

Taken By: Dan Coyne

Date: 3/25/92



Notes: Decontamination and deterioration of the north wall in the basement of 1860 North Elston prior to clean-up.

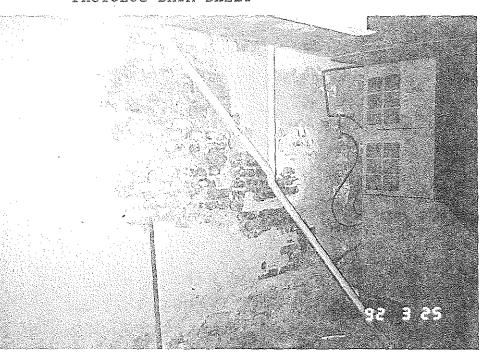
PHOTOLOG DATA SHEET

Project:
Aero Plating
Company
Location:
1860
North Elston
Photo #:
05

View Looking: Northeast

Taken By: Dan Coyne

Date: 3/25/92



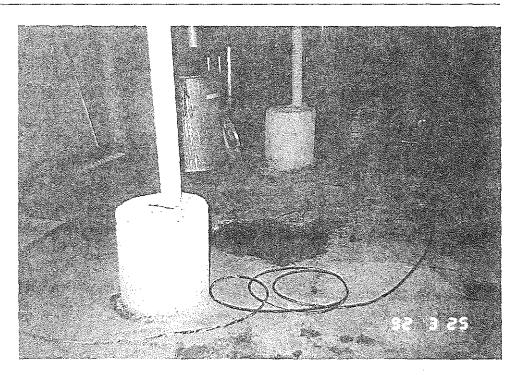
Notes: Wall conditions just east of the previous picture in the basement of 1860 North Elston Avenue.

Project:
Aero Plating
Company
Location:
1860
North Elston
Photo #:
06

View Looking: West

Taken By: Dan Coyne

Date: 3/25/92



Notes: Clean-up operations. Power washer is shown utilizing the decontamination solution. Walls and floors were scrubbed and power washed to rinse contaminants off the surfaces.

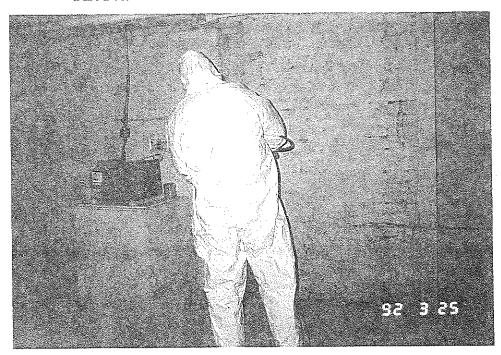
PHOTOLOG DATA SHEET

Project:
Aero Plating
Company
Location:
1860
North Elston
Photo #:
07

View Looking: South

Taken By: Dan Coyne

Date:
3/25/92



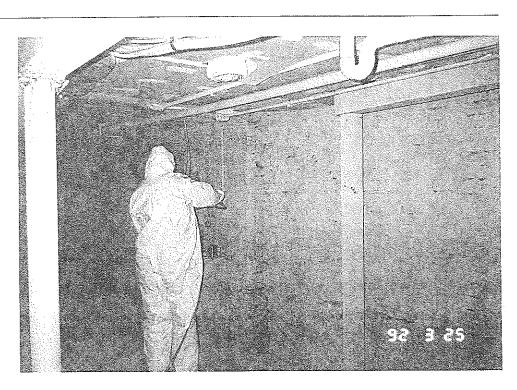
Notes: Worker clothing included hooded Tyvek suiting and latex gloves and boots for protection.

Project:
Aero Plating
Company
Location:
1860
North Elston
Photo #:
08

View Looking: South

Taken By: Dan Coyne

Date:
3/25/92



Notes: Worker is using the power sprayer and decontamination solution to clean the south wall of 1860 North Elston Avenue's basement.

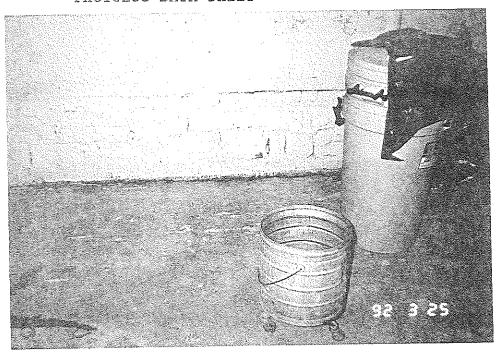
PHOTOLOG DATA SHEET

Project:
Aero Plating
Company
Location:
1860
North Elston
Photo #:
09

View Looking: South

Taken By: Dan Coyne

Date: 3/25/92



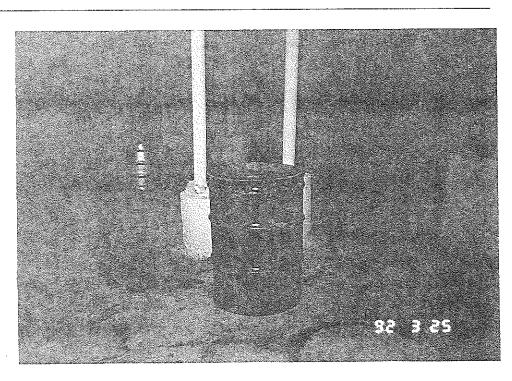
Notes: Cleaning supplies used in the cleaning operations. The smaller bucket was used for the decontamination solution. The trash cans were used for temporary storage of the hazardous waste produced from the cleaning.

Project:
Aero Plating
Company
Location:
1860
North Elston
Photo #:
10

View Looking: East

Taken By: Dan Coyne

Date: 3/25/92



Notes: Hazardous waste waters produced were temporarily stored in this 55 gallon drum.

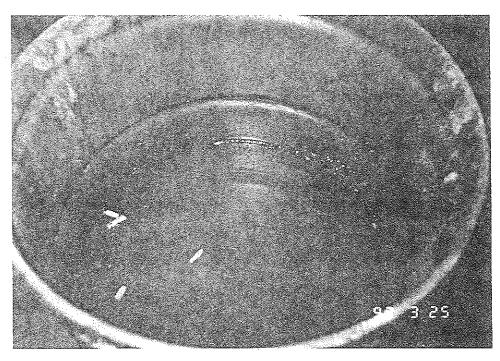
PHOTOLOG DATA SHEET

Project:
Aero Plating
Company
Location:
1860
North Elston
Photo #:
11

View Looking: East

Taken By: Dan Coyne

Date:
 03/25/92



Notes: Visual contents of the hazardous wastes in the 55 gallon drum during clean-up operations.

Project:
Aero Plating
Company
Location:
1860
North Elston
Photo #:
12

View Looking: Southwest

Taken By: Dan Coyne

Date: 3/25/92



Notes: Solid hazardous wastes produced during clean-up operations were transported in a plastic 55 gallon drum.

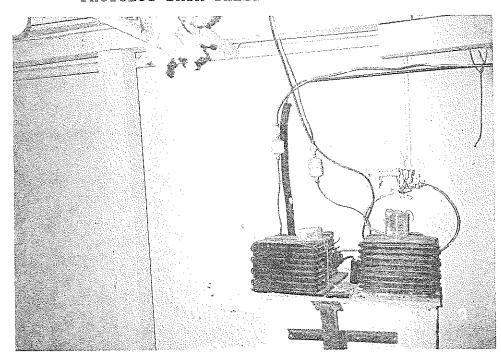
PHOTOLOG DATA SHEET

Project:
Aero Plating
Company
Location:
1860
North Elston
Photo #:
13

View Looking: North

Taken By: Dan, Coyne

Date: 4/07/92



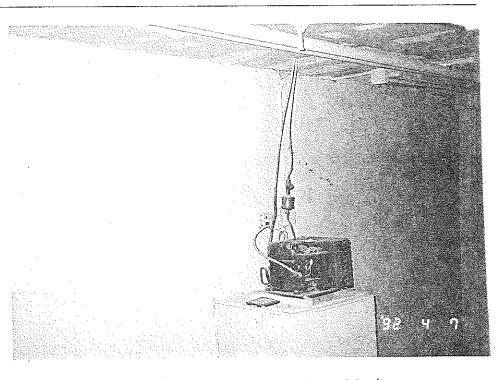
Notes: North wall surface after decontamination and sealing. The surfaces were then painted in the basement of 1860 North Elston Avenue.

Project:
Aero Plating
Company
Location:
1860
North Elston
Photo #:
14

View Looking: South

Taken By: Dan Coyne

Date: 4/07/92



Notes: Decontamination and sealing of the south wall in the basement of 1860 North Elston Avenue.

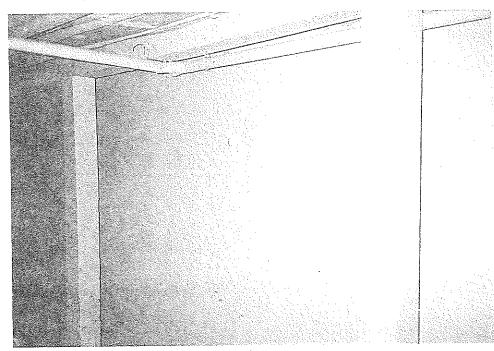
PHOTOLOG DATA SHEET

Project:
Aero Plating
Company
Location:
1860
North Elston
Photo #:
15

View Looking: North

Taken By: Dan Coyne

Date: 4/07/92



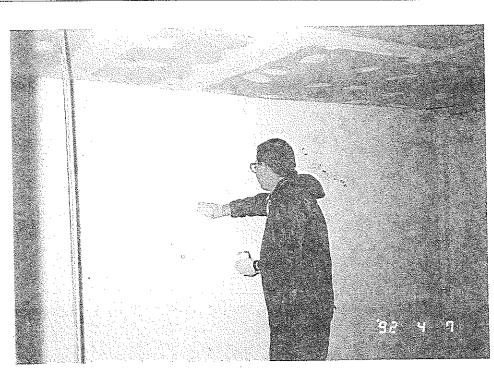
Notes: Decontamination and sealing of the north wall in the basement of 1860 North Elston Avenue.

Project:
Aero Plating
Company
Location:
1860
North Elston
Photo #:
16

View Looking:
 Southwest

Taken By: Dan Coyne

Date: 4/07/92



Notes: Surface wipe sampling for closure of the clean-up procedures in the basement of 1860 North Elston Avenue.

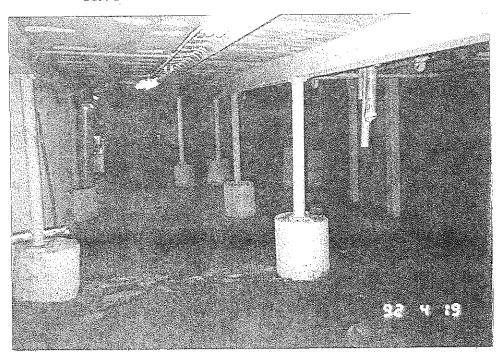
PHOTOLOG DATA SHEET

Project:
Aero Plating
Company
Location:
1860
North Elston
Photo #:
17

View Looking: East

Taken By: Dan Coyne

Date: 4/19/92



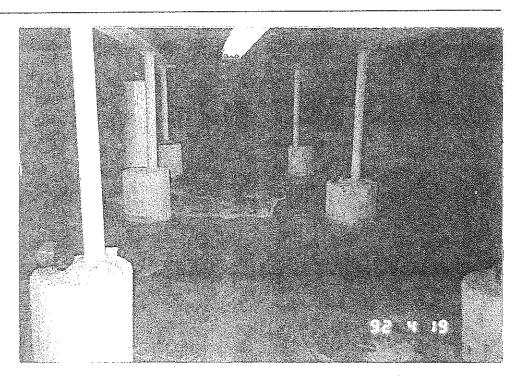
Notes: New concrete flooring was laid down over the old flooring after cleaning operations.

Project:
Aero Plating
Company
Location:
1860
North Elston
Photo #:
18

View Looking: East

Taken By: Dan Coyne

Date:
 4/19/92



Notes: Additional view of the new concrete floor in the basement of 1860 North Elston Avenue.

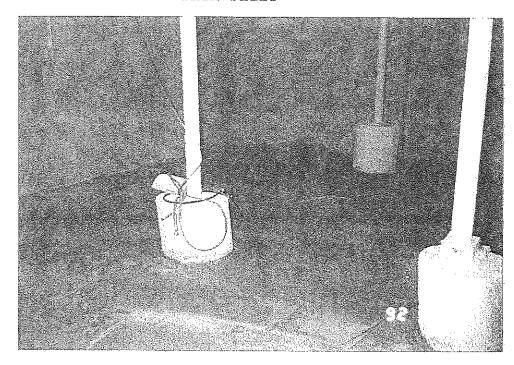
PHOTOLOG DATA SHEET

Project:
Aero Plating
Company
Location:
1860
North Elston
Photo #:
19

View Looking: Northeast

Taken By: Dan Coyne

Date: 4/19/92



Notes: Close-up view in the northeast corner of the concrete flooring laid in the basement of 1860 North Elston Avenue.

SUBSURFACE BORINGS IN THE HAZARDOUS WASTE STORAGE AREA

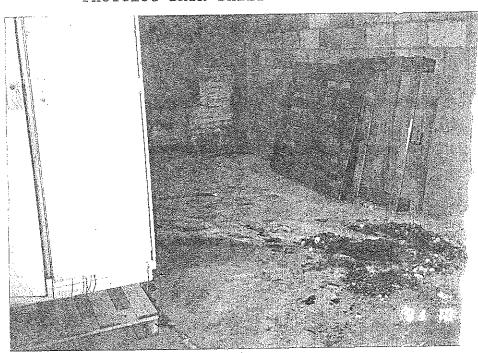
PHOTOLOG DATA SHEET

Project:
Aero Plating
Company
Location:
1850
North Elston
Photo #:
20

View Looking: Southeast

Taken By: Dan Coyne

Date: 10/26/91



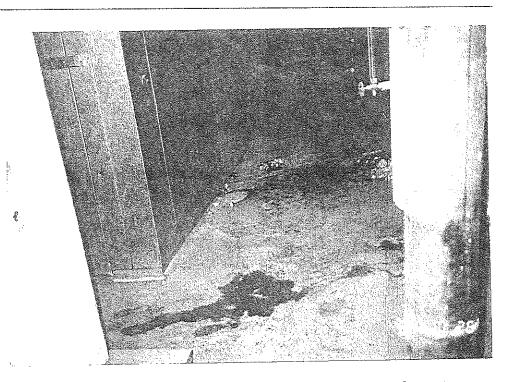
Notes: First boring drilled in the southwest corner of 1850 North Elston Avenue where Aero Plating previously stored hazardous waste.

Project:
Aero Plating
Company
Location:
1850
North Elston
Photo #:
21

View Looking: East

Taken By: Dan Coyne

Date: 10/26/91



Notes: Second boring drilled in the southwest corner of 1850 North Elston Avenue where Aero Plating previously stored hazardous waste.

12/23/93 SUBSURFACE INVESTIGATION

PHOTOLOG DATA SHEET

Project:
Aero Plating
Company
Location:
1850-1860
North Elston
Photo #:
22

View Looking: South

Taken By: Dan Coyne

Date: 12/23/93



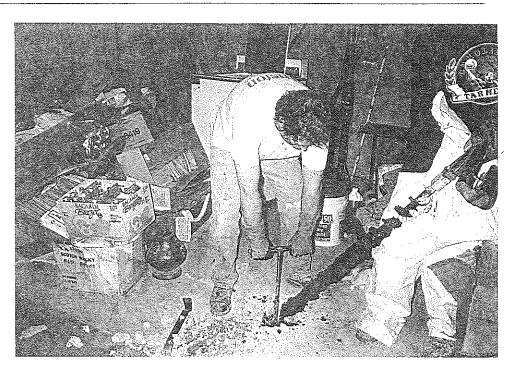
Notes: Shelby tube sampling at Boring #2 in the east central section of 1860 North Elston Avenue's basement.

Project:
Aero Plating
Company
Location:
1850-1860
North Elston
Photo #:
23

View Looking: Northwest

Taken By: Dan Coyne

Date: 12/23/93



Notes: Shelby tube sampling at Boring #3 in the west central section of 1860 North Elston Avenue's basement. Copper line pictured behind worker pumps basement drain water up from the sump pit to the public sewer lines located under Cortland Avenue.

PHOTOLOG DATA SHEET

Project:
Aero Plating
Company
Location:
1850-1860
North Elston
Photo #:
24

View Looking: Northwest

Taken By: Dan Coyne

Date: 12/23/93



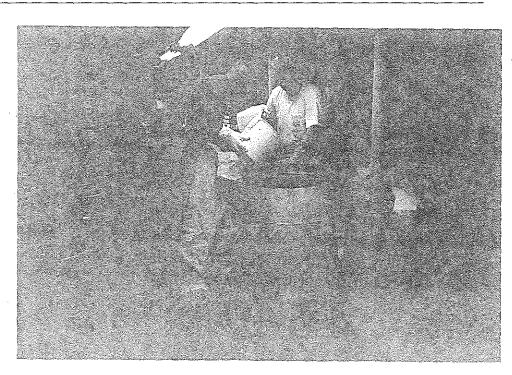
Notes: Shelby tube sampling at Boring #4 in the western section of 1860 North Elston Avenue's basement.

Project:
Aero Plating
Company
Location:
1850-1860
North Elston
Photo #:
25

View Looking: East

Taken By: Dan Coyne

Date: 12/23/93



Notes: Decontamination activities which took place between each auger drilling operation and sampling operation for the borings. Amended water was used in the rinsing procedures.

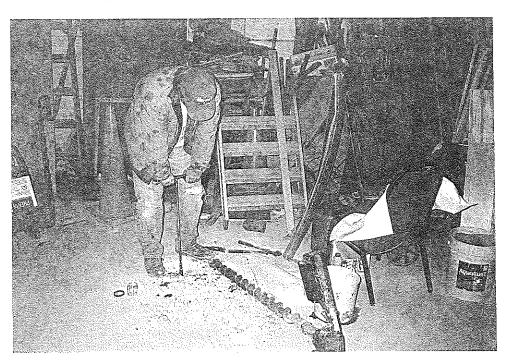
PHOTOLOG DATA SHEET

Project:
Aero Plating Company
Location:
1850-1860
North Elston
Photo #:
26

View Looking: East

Taken By: Dan Coyne

Date: 12/23/93



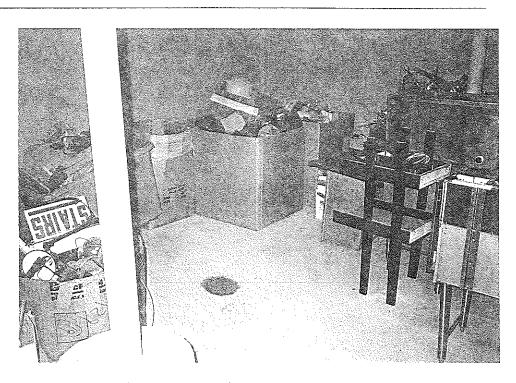
Notes: Shelby tube sampling at Boring #5 located in the northeast section of 1850 North Elston Avenue.

Project:
Aero Plating
Company
Location:
1850-1860
North Elston
Photo #:
27

View Looking: Northeast

Taken By: Dan Coyne

Date: 12/23/93



Notes: Location of Boring #1 located in the northeast section of 1860 North Elston Avenue's basement. Troweled cement finish is shown of where drilling operations took place.

PHOTOLOG DATA SHEET

Project:
Aero Plating
Company
Location:
1850-1860
North Elston
Photo #:
28

View Looking: South

Taken By: Dan Coyne

Date: 12/23/93



Notes: Troweled cement finish for Boring #2 in the east central section of 1860 North Elston Avenue's basement. Refer to picture #1 for drilling operations.

Project:
Aero Plating
Company
Location:
1850-1860
North Elston
Photo #:
29

View Locking: Northwest

Taken By: Dan Coyne

Date: 12/23/93



Notes: Troweled cement finish for Boring #3. Refer to picture #2 for drilling operations in this section. Again notice the sump pit that drains to the public sewer line under Cortland Avenue.

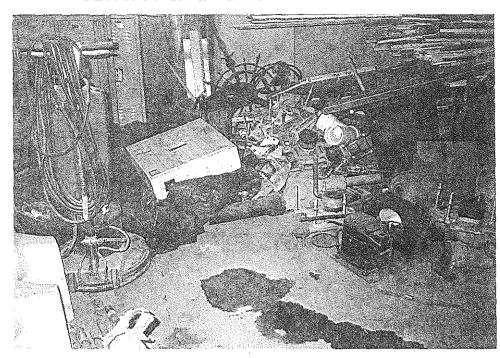
PHOTOLOG DATA SHEET

Project:
Aero Plating Company
Location:
1850-1860
North Elston
Photo #:
30

View Looking: Northwest

Taken By: Dan Coyne

Date: 12/23/93



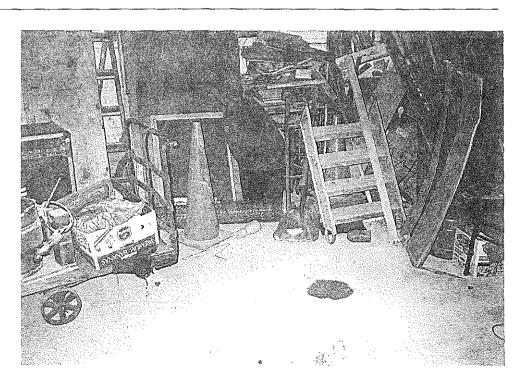
Notes: Troweled cement finish for Boring #4 in the western section of 1860 North Elston Avenue's basement. Refer to picture #3 for Drilling operations.

Project:
Aero Plating Company
Location:
1850-1860
North Elston
Photo #:
31

View Looking: East

Taken By: Dan Coyne

Date: 12/23/93



Notes: Troweled cement finish for Boring #5 in the northeast section of 1850 North Elston Avenue. Refer to picture #5 for drilling operations.

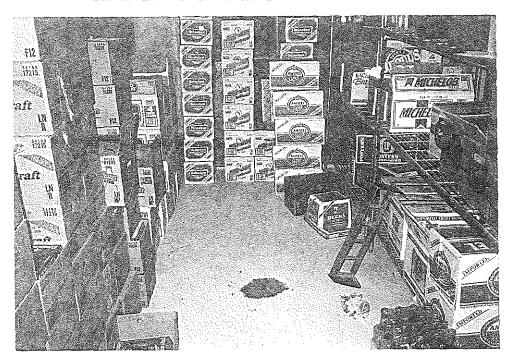
PHOTOLOG DATA SHEET

Project:
Aero Plating
Company
Location:
1850-1860
North Elston
Photo #:
32

View Looking: South

Taken By: Dan Coyne

Date: 12/23/93



Notes: Location of Boring #6 located approximately 35 feet southwest of Boring #5. Troweled cement finish shows where drilling operations took place.

CURRENT OPERATIONS & STRUCTURAL INTEGRITY

PHOTOLOG DATA SHEET

Project:
Aero Plating
Company
Location:
1850-1860
North Elston
Photo #:
33

View Looking: Northwest

Taken By: Dany Coyne

Date: 12/23/93



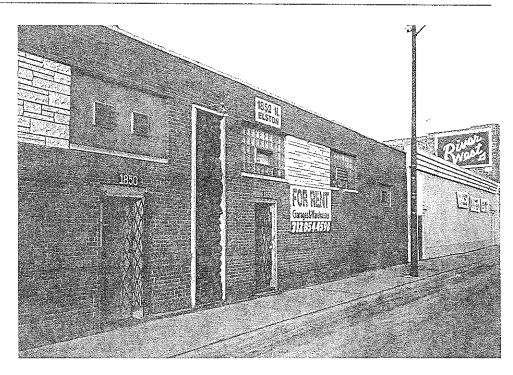
Notes: Northeastern front view of 1850-1860 North Elston Avenue facility looking across Elston Avenue. Notice the River West establishment sign.

Project:
Aero Plating Company
Location:
1850-1860
North Elston
Photo #:
34

View Looking: Northwest

Taken By: Dan Coyne

Date: 12/23/93



Notes: Southeastern front section of 1850-1860 North Elston Avenue. View is from Elston Avenue again.

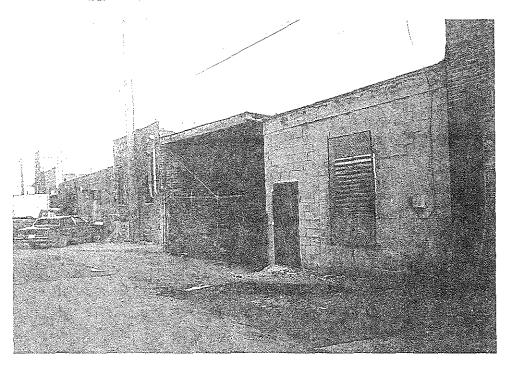
PHOTOLOG DATA SHEET

Project:
Aero Plating
Company
Location:
1850-1860
North Elston
Photo #:
35

View Looking: Northeast

Taken By: Dan Çoyne

Date: 12/23/93



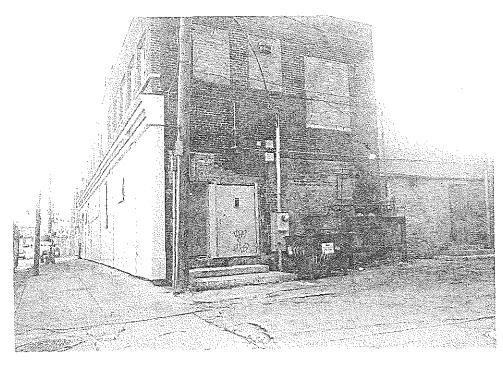
Notes: Southwestern section of 1850-1860 North Elston Avenue. View is from the facility's shipping and receiving alley running north and south. Main dock is pictured with metal fencing. This is currently an unused section of the building.

Project:
Aero Plating
Company
Location:
1850-1860
North Elston
Photo #:
36

View Looking: East

Taken By: Dan Coyne

Date: 12/23/93



Notes: Northwestern section of 1860 North Elston Avenue facility. View is from the corner of Cartland Avenue and the shipping and receiving alley.

PHOTOLOG DATA SHEET

Project:
Aero Plating
Company
Location:
1850-1860
North Elston
Photo #:
37

View Looking: West

Taken By: Dan Coyne

Date: 04/01/93



Notes: River West's seating area on the north section of 1860 North Elston Avenue's facility. The area has wooded floors, brick walls, and a drop ceiling below 2x10 ceiling joists. The main entrance is at the far east end. The second bar area, not pictured, is located just south of the sitting area (To the left under the pictured T.V.).

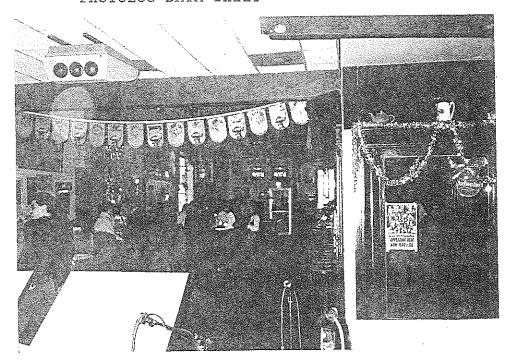
PHOTOLOG DATA SHEET

Project:
Aero Plating
Company
Location:
1850-1860
North Elston
Photo #:
38

View Looking: East

Taken By: Dan Coyne

Date: 12/23/93



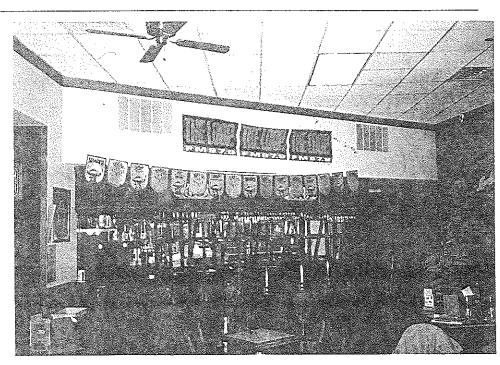
Notes: Opposite view of the previous picture The area has wooded floors, brick walls, and a drop ceiling below 2x10 ceiling joists. The main entrance is at the far east end. The second bar area, not pictured, is located just south of the sitting area.

Project:
Aero Plating
Company
Location:
1850-1860
North Elston
Photo #:
39

View Looking: East

Taken By: Dan Coyne

Date: 12/23/93



Notes: River West's second bar area in the central section of 1860 North Elston Avenue's facility. This area has tiled floors over concrete, brick walls and a drop ceiling below 2x10 ceiling joists. This view is just south of the previous picture.

PHOTOLOG DATA SHEET

Project:
Aero Plating
Company

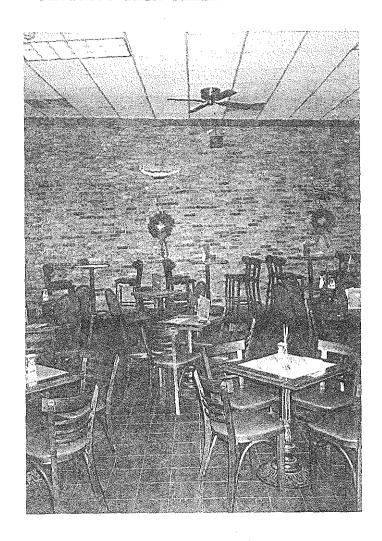
Location: 1850-1860 North Elston

Photo #:

View Looking: South

Taken By: Dan Coyne

Date: 12/23/93



Notes: River West's second seating area located in the southwest section of 1860 North Elston Avenue's facility. This area has tiled floors over concrete, brick walls and a drop ceiling below 2x10 ceiling joists.

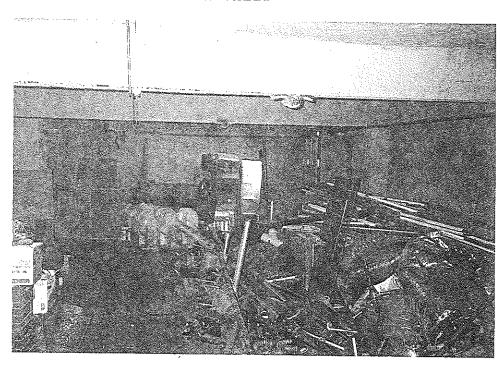
PHOTOLOG DATA SHEET

Project:
Aero Plating
Company
Location:
1850-1860
North Elston
Photo #:
41

View Looking: West

Taken By: Dan Coyne

Date: 12/23/93



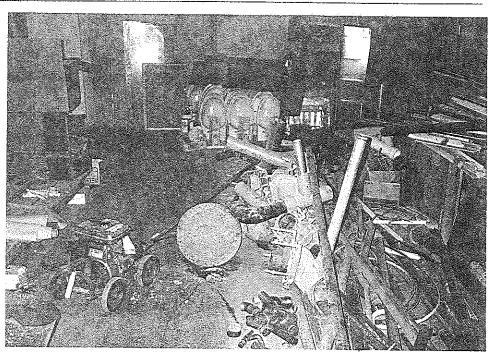
Notes: River West's west basement storage area. Shown here are concrete floors, walls and ceiling. Two concrete beams running north and south help support the ceiling.

Project:
Aero Plating Company
Location:
1850-1860
North Elston
Photo #:
42

View Looking: West

Taken By: Dan Coyne

Date: 12/23/93



Notes: River West's west basement storage area. Pictured here is the drain that flows east into the west sump pit. Newly poured concrete flooring by ACES Maintenance during closure operations show no evidence of cracking.

PHOTOLOG DATA SHEET

Project:
Aero Plating
Company

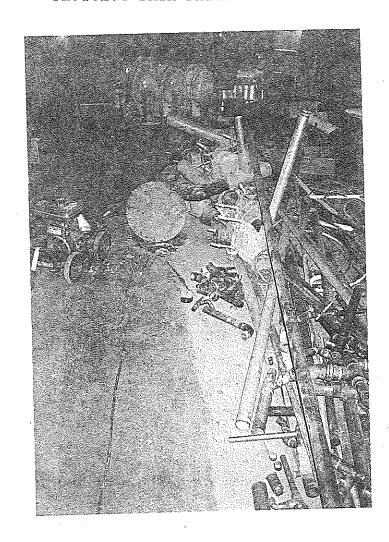
Location: 1850-1860 North Elston

Photo #:
43

View Looking: West

Taken By: Dan Coyne

Date: 12/23/93



Notes: Another view of the drain in the west section of River West's basement storage area.

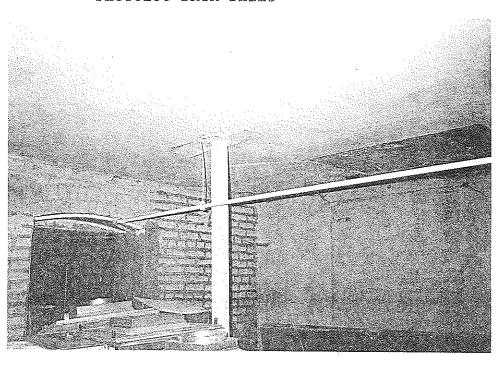
PHOTOLOG DATA SHEET

Project:
Aero Plating
Company
Location:
1850-1860
North Elston
Photo #:
44

View Looking: Southeast

Taken By: Dan Çoyne

Date: 12/23/93



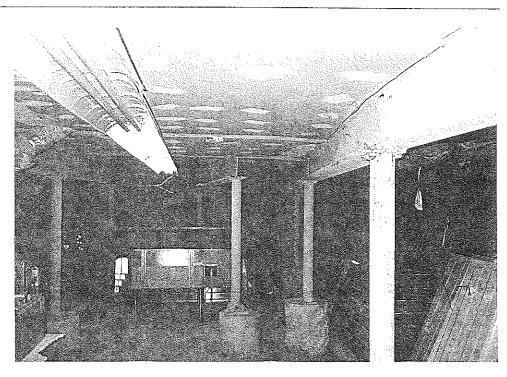
Notes: River West's west basement area where the previous two pictures showed the drain. The brick wall on the left divides the basement into two halves. Only one column exists in the west area as support in addition to the concrete beams shown in photograph #8.

Project:
Aero Plating Company
Location:
1850-1860
North Elston
Photo #:
45

View Looking: East

Taken By: Dan Coyne

Date: 12/23/93



Notes: River West's east section of the basement. Numerous columns support the 2x10 ceiling joists running north and south. Drywall has been hung to conceal the joists shown in photo #14.

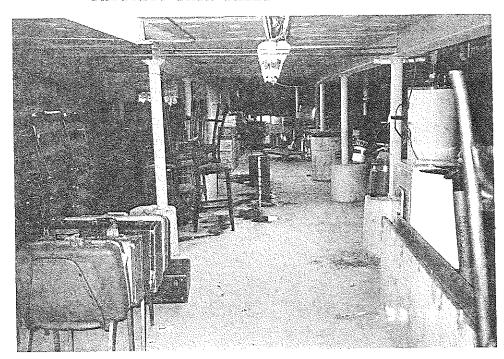
PHOTOLOG DATA SHEET

Project:
Aero Plating
Company
Location:
1850-1860
North Elston
Photo #:
46

View Looking: East

Taken By: Dan, Coyne

Date: 04/01/93



Notes: River West's east basement area prior to the 12/23/93 subsurface borings. The water on the floor is from the beer keg and not any possible contamination.

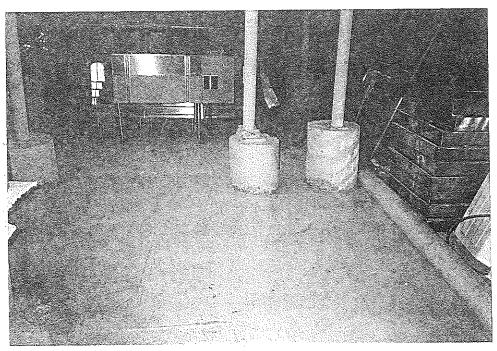
PHOTOLOG DATA SHEET

Project:
Aero Plating
Company
Location:
1850-1860
North Elston
Photo #:
47

View Looking: East

Taken By: Dan Coyne

Date: 12/23/93



Notes: River West's east basement area showing the new concrete floor laid after closure operations. No cracks exist in this area. The east sump pit is positioned behind the stainless steel objects where the copper line pumps water to the public sewer line under Elston Avenue. The copper line can be better seen in photograph # 45.

PHOTOLOG DATA SHEET

Project:
Aero Plating
Company

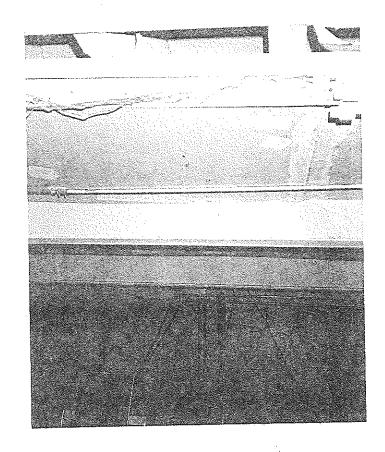
Location: 1850-1860 North Elston

Photo #: 48 %

View Looking: North

Taken By: Dan Coyne

Date: 12/23/93



Notes: River West's east basement area by the west sump pit area. Shown here is the 2x10 ceiling joists above the drywall.

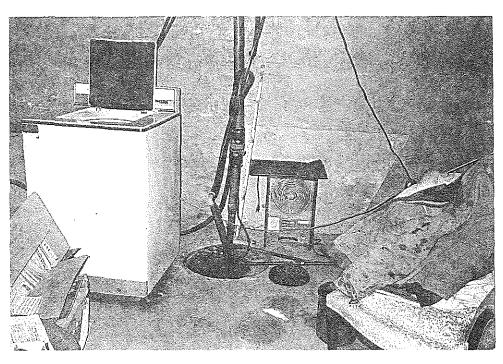
PHOTOLOG DATA SHEET

Project:
Aero Plating
Company
Location:
1850-1860
North Elston
Photo #:
49

View Looking: North

Taken By: Dan' Coyne

Date:
 12/23/93



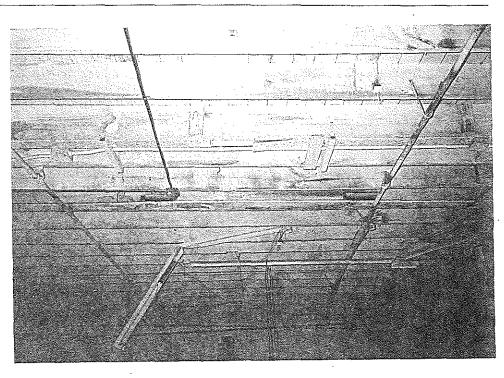
Notes: River West's east basement area where the sump pit was reference in the previous picture.

Project:
Aero Plating
Company
Location:
1850-1860
North Elston
Photo #:
50

View Looking: East

Taken By: Dan Coyne

Date: 12/23/93



Notes: River West's main floor storage area where a future banquet hall is planned. This view is looking east in the southern section of the storage area. Shown here are the 2x10 ceiling joists running north and south with tongue and grove for sheathing. Structural makeup includes block and concrete walls with concrete floors.

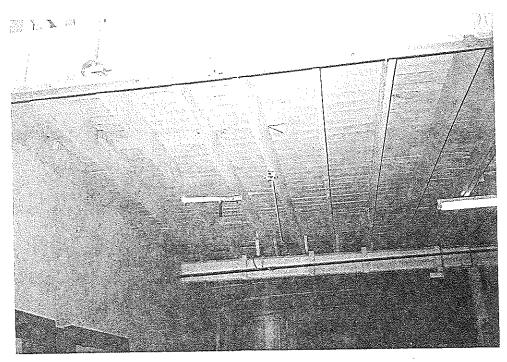
PHOTOLOG DATA SHEET

Project:
Aero Plating
Company
Location:
1850-1860
North Elston
Photo #:
51

View Looking: North

Taken By: Dan Coyne

Date: 12/23/93



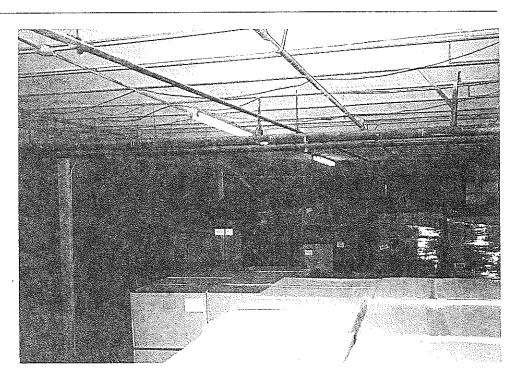
Notes: River West's storage area viewed from the southeast section. Shown here is an original load bearing brick wall on the north end with 2x10 ceiling joists and tongue and grove sheathing.

Project:
Aero Plating
Company
Location:
1850-1860
North Elston
Photo #:
52

View Looking: West

Taken By: Dan Coyne

Date: 12/23/93



Notes: LSL Medical Industries storage area. The smaller of the two dock doors is pictured in the background. Structural makeup consists of steel I-beam columns and 2x10 ceiling joists.

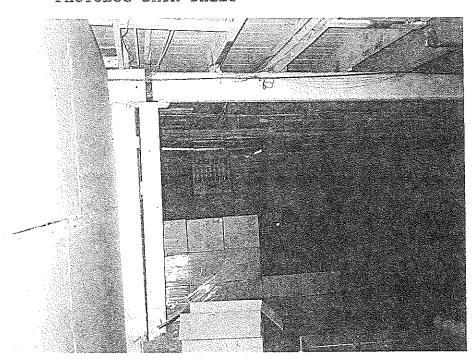
PHOTOLOG DATA SHEET

Project:
Aero Plating
Company
Location:
1850-1860
North Elston
Photo #:
53

View Looking: South

Taken By: Dan Coyne

Date: 12/23/93



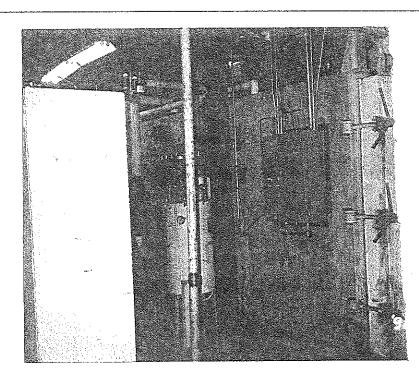
Notes: LSL Medical Industries storage area. The brick wall on the right contained the hazardous waste storage during the time of Aero Plating Company's occupancy. The interior partition wall on the left separates LSL Medical Industries from River West's storage area.

Project:
Aero Plating
Company
Location:
1850-1860
North Elston
Photo #:
54

View Looking: Southeast

Taken By: Dan Coyne

Date: 03/18/92



Notes: LSL Medical Industries sanitizing and water pressure instrumentation.

CONCRETE FLOORING CRACKS

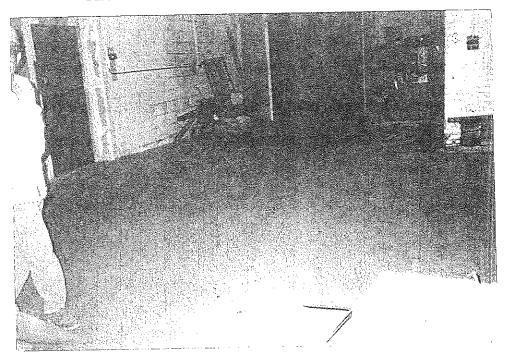
PHOTOLOG DATA SHEET

Project:
Aero Plating
Company
Location:
1850-1860
North Elston
Photo #:
55

View Looking: South

Taken By: Dan Coyne

Date: 08/27/93



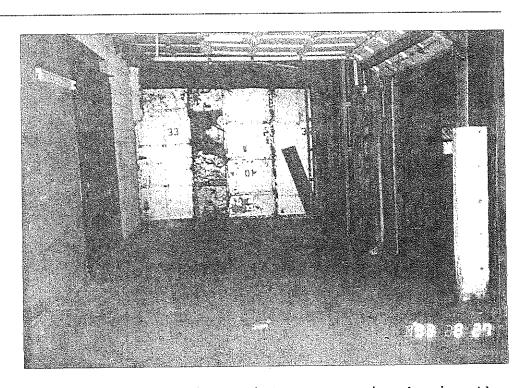
Notes: Southeastern portion of LSL Medical Industries.

Project:
Aero Plating
Company
Location:
1850-1860
North Elston
Photo #:
56

View Looking: South

Taken By: Dan Coyne

Date: 08/27/93



Notes: Further south of the previous picture. Again showing the southeastern portion of LSL Medical Industries.

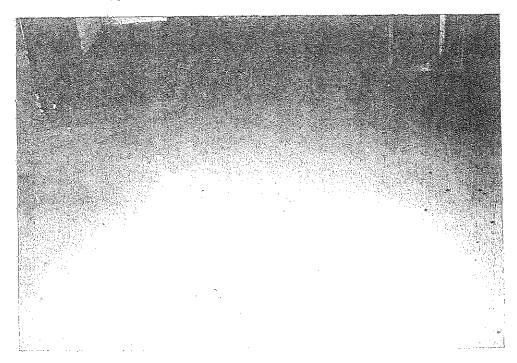
PHOTOLOG DATA SHEET

Project:
Aero Plating
Company
Location:
1850-1860
North Elston
Photo #:
57

View Looking: South

Taken By: Dan, Coyne

Date: 08/27/93



Notes: Close-up view of the previous photograph showing the detail of the concrete flooring. Again this is the southeastern portion of LSL Medical Industries.

PHOTOLOG DATA SHEET

Project:
Aero Plating
Company

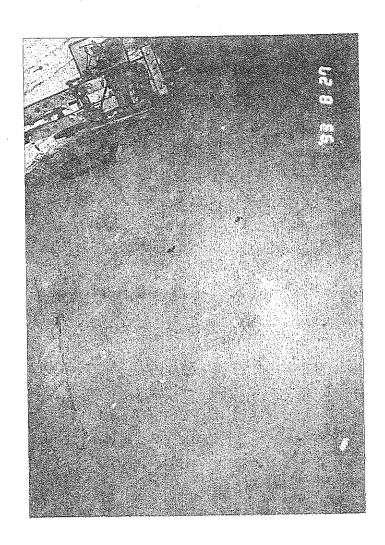
Location: 1850-1860 North Elston

Photo #: 58

View Looking: West

Taken By: Dan Coyne

Date: 08/27/93



Notes: This is in the same area as photograph #55. It's location is on the outer northeast corner of the hazardous waste storage area.

PHOTOLOG DATA SHEET

Project:
Aero Plating
Company
Location:
1850-1860
North Elston
Photo #:
59

View Looking: West

Taken By: Dan Coyne

Date: 08/27/93



Notes: Flooring just north of the hazardous waste storage area.

Project:
Aero Plating
Company
Location:
1850-1860
North Elston
Photo #:
60

View Looking: West

Taken By:
Dan Coyne

Date: 08/27/93



Notes: Close-up view farther west of the previous picture.

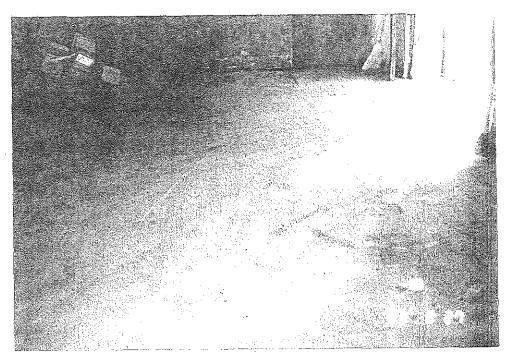
PHOTOLOG DATA SHEET

Project:
Aero Plating
Company
Location:
1850-1860
North Elston
Photo #:
61

View Looking: South

Taken By: Dan Coyne

Date: 08/27/93



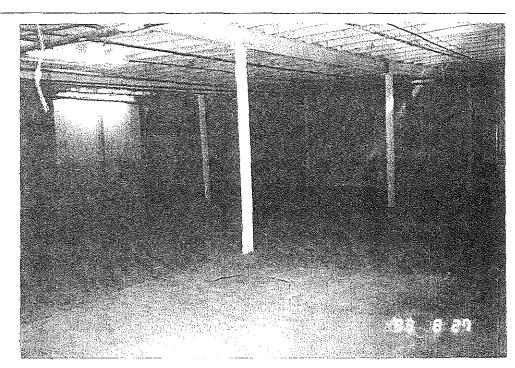
Notes: View is looking at the flooring just in front of the small dock door in LSL Medical Industries.

Project:
Aero Plating
Company
Location:
1850-1860
North Elston
Photo #:
62

View Looking: Northeast

Taken By: Dan Coyne

Date:
 08/27/93



Notes: Concrete flooring in the Northeast section of LSL Medical Industries.

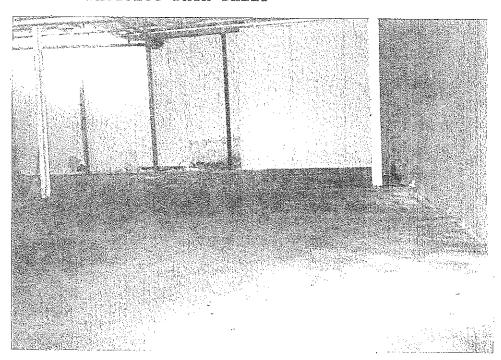
PHOTOLOG DATA SHEET

Project:
Aero Plating
Company
Location:
1850-1860
North Elston
Photo #:
63

View Looking: North

Taken By: Dan Coyne

Date: 08/27/93



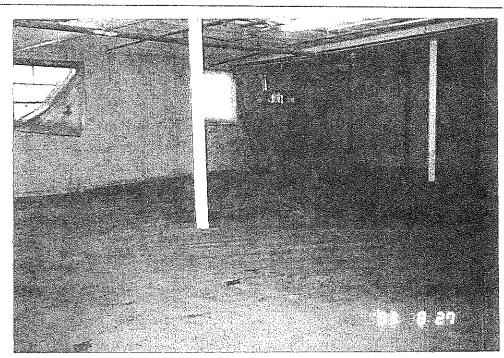
Notes: Additional view of LSL Medical Industries northeastern concrete flooring.

Project:
Aero Plating
Company
Location:
1850-1860
North Elston
Photo #:
64

View Looking: Northwest

Taken By: Dan Coyne

Date: 08/27/93



Notes: Concrete flooring in the northwest section of LSL Medical Industries.

PHOTOLOG DATA SHEET

Project:
Aero Plating
Company

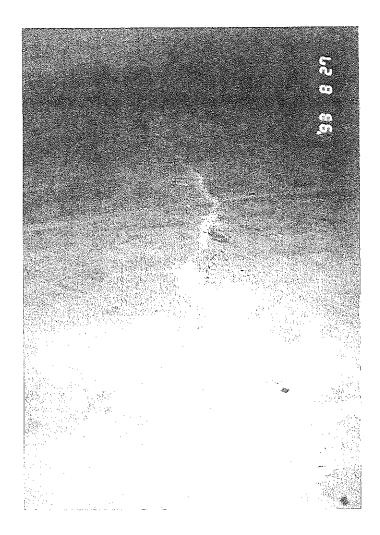
Location: 1850-1860 North Elston

Photo #: 65

View Looking: Northwest

Taken By: Dan Coyne

Date: 08/27/93



Notes: Close-up view of the previous picture showing the concrete flooring in the northwest section of LSL Medical Industries.

EXHIBIT 'D'
ANALYTICAL RESULTS

PAST SUBSURFACE ANALYTICAL RESULTS

CARDRATORY HOR & MOLIN AVENUE HCAGO, IL 60623-4889 13121 234-2406 (312) 284-6661

Empired who 225 MITCHICUL CT., BUITE . CHESAPEAKE SQUARE ADDISON, IL 60/01/5604 COOT - 030 (BOT) FAX (708) 629-1055

LABORATORIES. INC. TESTING - CONSULTING

REPORT TO:

Rodney L. Jacobs

Attorney at Law 1500 Shure Drive

Arlington Hts IL 60004

ATTENTION:

LAB NO:

54-998

RECEIVED:

7~09-91

TEST TYPE: Soil Analysis

REPORTED:

7 - 22 - 91

IDENTIFICATION OF MATERIAL!

One (1) soil sample, identified as: LOU MATORANO PROJECT

. Area B 6"-12" 7-10-91

PURPOSE:

The purpose of the testing is to determine if the submitted sample is hazardous as per 40 CFR, Part 261, Subpart C.

I, B P TOXICITY:

PROCEDURE:

The sample was leached and analyzed in accordance with the procedure specified in 40 CFR, Part 261, Appendix II.

RESULTS:

A. L. Company of the		If Analysis is above or	
	EPA Hazardous	equal to this value, the	Analysi
Parameter:	Raste Number	<u>Vaste is deemed hazardous</u>	(mg/L)
Chromium	D007	5.0	< 0,1
Hexavalent Chromium	D007	5.0	<0.025
Nickel	بسم سيد مده	20.0	32,4

II. TOTAL CYANIDE

PROCEDURE:

The sample was analyzed in accordance with "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods SW-846 USEPA," Method 9010.

RESULTS: Total Cyanide Concentration in ppm

1.00

Respectfully submitted,

SCIENTIFIC CONTROL LABORATORIES, INC.

Colette Rohan

CR:clm

Sample returned via U.P.S.

LABURATORY MIDE B. KOLIN AVENUE 4GO, IL 80823-4889 (312) 254-2406 FAX (312) 254-6661



ENGINE LRIVING 225 MITCHELL CT., SUITE AIR CHESAPEAKE SQUARE ADDIBON, IL 8010115604 (708) 629.7355 FAX (708) 623-7055

CONTROL LABORATORIES, INC. TESTING - CONSULTING

REPORT TO:

Rodney L. Jacobs Attorney at Law. 1500 Shure Drive

Arlington Hts IL 50004

ATTENTION:

LAB NO:

54-998

TEST TYPE: Soil Analysis

RECEIVED: REPORTED:

7-09-91 7-22-91

IDENTIFICATION OF MATERIAL:

One (1) soil sample, identified as: LOU MAIORANO PROJECT

. Area B 0"-6" 7-10-91

Berry A-Z.

PURPOSE

The purpose of the testing is to determine if the submitted sample is hazardous as per 40 CFR, Part 261, Subpart C.

I. R P TOXICITY:

PROCEDURE:

The sample was leached and analyzed in accordance with the procedure specified in 40 CFR, Part 261, Appendix II.

RESULTS:

<u>* </u>		Li Analysis is above or	
	EPA Hazardous	equal to this value, the	Analysis
Parameter:	Waste Number	waste is deemed hazardous	(mg/L)
Chromium	D007	5.0	<0.1
Hexavalent Chromium	D007	5.0	<0,025
Nickel	Main type 4500 Minn	20.0	65.8

II. TOTAL CYANIDE

PROCEDURE:

The sample was analyzed in accordance with "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods SW-846 USEPA," Method 9010.

RESULTS: Total Cyanide Concentration in ppm

1.45

Respectfully submitted,

SCIENTIFIC CONTROL LABORATORIES, INC.

Colette Rohan

CR:clm raturnad ula 11 D C 12/23/93 SUBSURFACE ANALYTICAL RESULTS

12/23/93 SUBSURFACE INVESTIGATION LOCATIONS

1860 North Elston Avenue Basement:

Boring #1: East Basement Area 1860-12-2301: Sampling at 18 inches 1860-12-2302: Sampling at 3 feet

Boring #2: Eastern Central Basement Area 1860-12-2303: Sampling at 18 inches 1860-12-2304: Sampling at 3 feet

Boring #3: Western Central Basement Area 1860-12-2305: Sampling at 18 inches 1860-12-2306: Sampling at 3 feet

Boring #4: West Basement Area 1860-12-2307: Sampling at 18 inches 1860-12-2308: Sampling at 3 feet

1850 North Elston Avenue Main Floor:

Boring #5: Northeast Area of Future Banquet Hall 1850-12-2309: Sampling at 18 inches 1850-12-2310: Sampling at 3 feet

Boring #6: Southwest Area of Future Banquet Hall 1850-12-2311: Sampling at 18 inches 1850-12-2312: Sampling at 3 feet

Barton Dukwon 660 A Balten Ro Barrett L 80103 Tek (708) 289-5445

ANALYTICAL REPORT

Mr. Dan Coyne ACES MAINTENANCE P.O. BOX 511 Wheaton, II, 60189

01/12/1994

Sample No. :

245032

NET Job No.: 93.11433

Sample Description: 1860-12-2301

Date Taken: 12/23/1993. Time Taken:

Date Sample Picked Up: 12/27/1993

IEPA Cert. No. 100221

Date Received: 12/27/1993

Time Received: 09:45

WDNR Cert. No. 999447130

Parameter	R≢sults	flags	Units	Date of Analysis	Analytical Method
Chronium, hexavatent Cyanide, total Solids, Total Cadmium, ICP Chronium, ICP Wickel, ICP	<12 0.41 80.4 4.0 60.1 20.100	7	u9/g v9/g % ug/g u9/g	01/04/1994 01/04/1994 01/05/1994 01/05/1994 01/05/1994	3500D(4) 7196(1) 9010 (1) 2540 (4) 6010(4) 200.7(3) (6010 (1) 6010 (1)





NATIONAL ENVIRONMENTAL TESTING, INC.

Barriett Division 550 V., Barriett As Barriett, ib. 80103 Ter (70a) 283-3400 Fax (70a) 289-5443

ANALYTICAL REPORT

Mr. Dan Coyne ACES MAINTENANCE P.O. BOX 511 Wheaton, IL 60189

01/12/1994

Sample No. : 245029

NET Job No.: 93.11433

Sample Description:

1860-12-2302

Date Taken:

12/23/1993

Time Taken:
Date Sample Picked Up: 12/27/1993

IEPA Cert. No. 100221

Date Received: 12/27/1993

Time Received: 09:45

WDNR Cert. No. 999447130

Parameter	Results	Flags	Units	Date of Analysis	Analytics: Method
Chromium, hexavalent	< 1 4		ug/g	01/04/1994	35000(4) 7196(1)
Cyanide, total	0.15		ug/g	01/04/1994	9010 (1)
Solids, Total	72.6		%	01/05/1994	2540 (4)
Cadmium, ICP	2.51		ug/g	01/05/1994	6010(4) 200.7(3)
Chromium, 1CP	39.9		ug/g	03/05/1994	6010 (1)
Nickel, ICP	12,160		ug/g	01/06/1994	6010 (1)



Bartett Diwardt 850 W. Bartett Bo Bartett, L. 60103 Teir (708) 286-8100 Fab. (708) 288-8446

ANALYTICAL REPORT

Mr. Dan Coyne ACES MAINTENANCE P.O. BOX 511 Wheaton, IL 60189 01/12/1994

Sample No. : 245027

NET Job No.: 93.11433

Sample Description: 1860-12-2303

12/27/1993

Date Taken: 12/23/1993 Time Taken:

Date Sample Picked Up: IEPA Cert. No. 100221

Date Received: 12/27/1993

Time Received: 09:45

WDNR Cert. No. 999447130

Parameter	Хеsults	fiags	Units	Sate of Analysis	Analytica: Method
Chromium, hexavatent	<15	*	ug/g	01/04/1994	35000(4) 7196(1)
Cyanide, total	0.25		Va/g	01/04/1994	9010 (1)
Solids, Total	67.4		%	01/05/1994	2540 (4)
Cadmium, 18P	1.60		∪g/g	01/05/1994	6010(4) 200.7(3)
Chromium, ICP	182		ug/g	01/05/1994	6010 (1)
Mickel, ICP	5,850			01/05/1994	6010 (1)





Bartiett Division 860 W. Bartiett Ro Bartiett, ild 60103 Tel (708) 289-2100 Fax. (708) 289-5446

ANALYTICAL REPORT

Mr. Dan Coyne ACES MAINTENANCE P.O. BOX 511 Wheaton, IL 60189

01/12/1994

Sample No. : 245028

NET Job No.: 93,11433

Sample Description: 1860-12-2304

Date Taken: 12/23/1993

Time Taken:

Date Sample Picked Up: 12/27/1993

IEPA Cert. No. 100221

Date Received: 12/27/1993

Time Received: 09:45

WDNR Cert. No. 999447130

Parameter	Results	Flags	Units	Date of Analysis	Analytical Method
Chromium, hexavalent Cyanida, total Solids, Total Cadmium, 109 Chromium, 109 Nickel, 109	<13 <0.14 74.9 1.34 470 3,580	3	ug/g wg/g % ug/g ug/g	01/04/1994 01/04/1994 01/05/1994 01/05/1994 01/05/1994	35000(4) 7196(1) 9010 (1) 2540 (4) 6010(4) 200.7(3) 6010 (1)



Barren Diversion 860 W. Barren Ro Barner (L 80103) Te (70%) 268-3100 Fax (706, 269-5448

ANALYTICAL REPORT

Mr. Dan Coyne ACES MAINTENANCE P.O. BOX 511 Wheaton, IL 60189

01/12/1994

Sample No. : 245035

NET Job No.: 93.11433

Sample Description: 1860-12-2305

Date Taken:

12/23/1993

Time Taken:

Date Sample Picked Up: 12/27/1993

IEPA Cert. No. 100221

Date Received: 12/27/1993

Time Received: 09:45

WDNR Cert. No. 999447130

Parameter	Results	Flags	Units	Date of Analysis	Analytical Mothod
Chromium, hexavalent Cyanide, total Solids, Total Cadmium, ICP Chromium, ICP Nickel, ICP	<13 9.0 78.9 1.44 556 1,230	* 510	ug/g ug/g ug/g ug/g	01/04/1994 01/04/1994 01/05/1994 01/05/1994 01/05/1994 01/05/1994	35000(4) 7194(1) 9010 (1) 2540 (4) 6010(4) 200.7(3) 6010 (1)

*Digested spike recovery was unexceptable, so a post MS/MSD was analyzed and the recovery was exceptable.

610 : Parameter analysis performed at a 10x dilution.





Barriert Division 850 W. Barriert Flo Barriert III 50103 Te. (708) 289-2100 Fax (708) 289-6446

ANALYTICAL REPORT

Mr. Dan Coyne ACES MAINTÉNANCE P.O. BOX 511 Wheaton, IL 60189

01/12/1994

Sample No. : 245025

NET Job No.: 93.11433

Sample Description: 1860-12-2306

Date Taken: 12/23/1993

Time Taken:

Date Sample Picked Up: 12/27/1993

IEPA Cert. No. 100221

Date Received: 12/27/1993

Time Received: 09:45

WDNR Cert. No. 999447130

Paramster	Results	Flags	Units	Date of Analysis	Anelytical Method
Chromium, hexavatent	<13 ⁻	*	ug/g	01/04/1994	35000(4) 7196(1)
Cyanide, total	6.13	02	∪g/g	01/04/1994	9010 (1)
Solids, Total	75.1		%	01/05/1994	2540 (4)
Cadmium, ICP	0.95		ug/ģ	81/05/1994	6010(4) 200.7(3)
Chromium, ICP	446		ug/g	01/05/1994	6010 (1)
Rickel, ICP	814		Ug/5	01/05/1994	6010 (1)

*Digested spike recovery was unexceptable, so a post MS/MSD was analyzed and the recovery was exceptable.

D2 : Parameter enalysis performed at a 2x dilution.



Santett Division 850 V. Bemett Go Bemennig 60103 Te. (708) 289-5100 Fax (708) 289-5446

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ANALYTICAL REPORT

Mr. Dan Coyne ACES MAINTENANCE P.O. BOX 511 Wheaton, IL 60189 01/12/1994

Sample No. : 245024

NET Job No.: 93.11433

Sample Description: 1860-12-2307

Date Taken: 12/23/1993

Time Taken:

Date Sample Picked Up: 12/27/1993 IEPA Cert. No. 100221

Date Received: 12/27/1993

Time Received: 09:45

WDNR Cert. No. 999447130

Parameter	Results	Flags	Units	Date of Analysis	Analytical Method
Chromium, hexavalent	<13	2	ug/g	01/04/1994	35000(4) 7196(1)
Cyanide, total	12.4	05	us/g	01/04/1994	9010 (1)
Solids, Total	74.3		%	01/05/1994	2540 (4)
Cadmium, ICP	Q. 97		ug/g	01/05/1994	5010(4) 200,7(3)
Chromium, ICP	81,4		ug/ģ	01/05/1994	6010 (1)
Nickel, 1CP	689		nā/ē	01/05/1994	6010 (1)

D5 : Parameter analysis performed at a 5x dilution.



[&]quot;Digested spike recovery was unexceptable, so a post M\$/MSD was analyzed and the recovery was exceptable.



Barrett Division 800 W. Barrett Po Barrett, AL 80103 Ter (708) 289-3100 Pax (708) 288-5443

ANALYTICAL REPORT

Mr. Dan Coyne ACES MAINTENANCE P.O. BOX 511 Wheaton, IL 60189 01/12/1994

Sample No. : 245033

NET Job No.: 93.11433

Sample Description: 1860-12-2308

Date Taken: 12/23/1993

Time Taken:

12/27/1993

Date Sample Picked Up: IEPA Cert. No. 100221

Date Received: 12/27/1993

Time Received: 09:45

WDNR Cert. No. 999447130

Psramete-	Results	Flass	units	Date of Analysis	Analytical Method
Chromium, hexavalent Cyanide, total Solids, Total Cadmium, ICP Chromium, ICP Nickel, ICP	<12 0.48 80.5 <0.40 27.3 97.5	ŧ	ug/g ug/g % ug/g ug/g	01/04/1994 01/04/1994 01/05/1994 01/05/1994 01/05/1994	35000(4) 7196(1) 9010 (1) 2540 (4) 6010(4) 200.7(3) 6010 (1) 6010 (1)





NATIONAL ENVIRONMENTAL TESTING, INC.

Barrett Division 630 W. Barriett Ro Barren (1,60103 Ter (708) 259-2100 Pay: (705: 269-5446

ANALYTICAL REPORT

Mr. Dan Coyne ACES MAINTÉNANCE P.O. BOX 511 Wheaton, IL 60189

01/12/1994

Sample No. : 245031

NET Job No.: 93.11433

Sample Description: 1850-12-2309

Date Taken: 12/23/1993

Time Taken:

Date Sample Picked Up: 12/27/1993 IEPA Cert. No. 100221

Date Received: 12/27/1993

Time Received: 09:45

WDNR Cert. No. 999447130

Paremeter	Results	flags	Units.	Date of Analysis	Analytical Method
Chromium, hexavalent	<10	*	ug/g	01/04/1994	35000(4) 7196(1)
Cyanide, toral	1.44		4 g/9	01/04/1994	9010 (1)
Solids, Total	95.4		%	01/05/1994	2540 (4)
Cadmium, [CP	<0.60		ug/g	01/05/1994	6010(4) 200,7(3)
Chromium, ICP	4.4		ug/g	01/05/1994	6010 (1)
Nickel, 1CP	5.2		ଘଣି/ଥି	01/05/1994	6010 (1)

[&]quot;Digested spike recovery was unexceptable, so a post MS/MSD was analyzed and the recovery was exceptable.





Ban ett Division 850 iv Bardeti Fo Bardeti It 80103 Tel (708) 389-3100 Max (708) 289-5445

ANALYTICAL REPORT

Mr. Dan Coyne ACES MAINTENANCE P.O. BOX 511

Wheaton, IL 60189

01/12/1994

Sample No. : 245023

NET Job No.: 93.11433

Sample Description: 1850-12-2310

Date Taken: 12/23/1993

Time Taken:
Date Sample Picked Up: 12/27/1993

IEPA Cert, No. 100221

Date Received: 12/27/1993

Time Received: 09:45

WDNR Cert. No. 999447130

Parameter	Results	Flags	Units	Date of Analysis	Analytical Method
Chromium, hexavalent	<11	*t	ug/g	01/04/1994	35000(4) 7196(1)
Cyanide, total	1.02		⊔ 9/9	01/04/1994	9010 (1)
Solids, Total	95.0		%	01/05/1994	2540 (4)
Cadmium, ICP	<0.60		ug/g	01/05/1994	6010(4) 200.7(3)
Chromium, ISP	8.\$		ug/g	01/05/1994	6010 (1)
Nicket, ICP	3.7		ug/g	01/05/1994	6010 (1)





Bartistr Division 850 W. Bartist Ad Bartistr IU 80103

Tar. (709) 289-3100 Fax: (703) 289-5446

ANALYTICAL REPORT

Mr. Dan Coyne ACES MAINTENANCE P.O. BOX 511 Wheaton, IL 60189 01/12/1994

Sample No. :

NET Job No.:

93.11433

Sample Description:

1860-12-2311

Date Taken: Time Taken:

12/23/1993

12/27/1993

Date Sample Picked Up: IERA Cert. No. 100221

Date Received: 12/27/1993

Time Received: 09:45

WDNR Cert. No. 999447130

Parameter	Results	Flags	Units	Date of Analysis	Analytical Method
Chromium, hexavalent Cyanide, total Solids, Total Caomium, ICP Chromium, ICP Nickel, ICP	<11 0.12 95.3 <0.60 <2.5 <3.0	٦	US/9 US/5 % US/9 US/9	01/04/1994 01/04/1994 01/05/1994 01/05/1994 01/05/1994 01/05/1994	35000(4) 7196(1) 9010 (1) 2540 (4) 6010(4) 200.7(3) 6010 (1) 6010 (1)





NATIONAL ENVIRONMENTAL TESTING, INC. Barriert Division 550 W. Barriert Ro Barriert (60103 Tell (705) 289-3100 Fax (705) 289-3446

ANALYTICAL REPORT

Mr. Dan Coyne ACES MAINTENANCE P.O. BOX 511 Wheaton, IL 60189

01/12/1994

Sample No. : 245030

NET Job No.: 93.11433

Sample Description: 1850-12-2312

Date Taken: 12/23/1993

Time Taken:

Date Sample Picked Up: 12/27/1993

IEPA Cert, No. 100221

Date Received: 12/27/1993

Time Received: 09:45

WDNR Cert. No. 999447130

Paramoter	Results	Flags	Units	Date of Amplysis	Analytical Method
Chromium, hexavalent	<11	*	ug/g	01/04/1994	35000(4) 7196(1)
Cyanide, total	0.15		ug/g	01/04/1994	9010 (1)
Solids, Total	96.0		%	01/05/1994	2540 (4)
Cadmium, ICP	<0.60		ug/g	01/05/1994	6010(4) 200.7(3)
Chromium, ICP	<2.5		ug/g	01/05/1994	6010 (1)
Hickel, ICP	<3.0		ug/g	01/05/1994	6010 (1)



NET Midwest, Bantiett Division

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KEY TO ABBREVIATIONS and METHOD REFERENCES

×.	: Loss than; When appearing in the results column indicates the analyte was not detected at or above the reported value.
mg/s	: Concentration in units of milligrams of analyte per liter of sample. Measurement used for aqueous samples. Can also be expressed as parts per million (ppm).
45 /9	: Concentration in Units of micrograms of analyte per gram of sample. Measurement used for non-aqueous samples. Can also be expressed as parts per million (ppm) or mg/Kg.
√ \$/√	: Concentration in units of micrograms of analyte per liter of sample. Measurement used for aqueous samples. Can also be expressed as parts per billion (ppb).
ug/Kg	: Concentration in units of micrograms of analyte per kilogram of sample. Measurement used for non-aqueous samples. Can also be expressed as parts per billion (ppp).
B	: Sample result flag indicating that the analyte was also found in the method blank analysis. The value after the B indicates the concentration found in the blank analysis.
ε	: Sample result flag indicating that the reported concentration exceeds the linear range of the instrument for that specific analysis and should be considered estimated.
TCLP	: These initials appearing in front of an analyte name indicate that the Toxicity Characteristic Leaching Procedure (TCLP) was performed for this test.
%	: Parcent; To convert ppm to %, divide the result by 10,000. To convert % to ppm, multiply the result by 10,000.
Dry Weight	: When indicated, the results are reported on a dry weight basis. The contribution of the maisture content in the sample is subtracted when calculating the concentration of the analyte.
109	: Indicates analysis was performed using Inductively Coupled Plasma Spectroscopy.
AA	: Indicates analysis was performed using Atomic Absorption Spectroscopy.
GFAA	: Indicates analysis was performed using Graphite Furnace Atomic Absorption Spectroscopy.
POL	: Practical Quantitation Limit; the lowest level that can be reliably achieved within specified limits of precision and accuracy during routine laboratory operating conditions.
Nothod Referen	ces
(1)	Methods 1000 through 9999: see "Test Methods for Evaluating Solid Waste", USEPA SW-846, 3rd Edition, 1986.
(2)	ASTM "American Society for Testing Materials
(3)	Mothods 100 through 499: see "Methods for Chemical Analysis of Water and Wastes", USEPA, 600/4-79-020, Rev. 1983.
(4)	See "Standard Methods for the Examination of Water and Wastewater", 17th Ed. APHA, 1989.
(5)	Methods 600 through 625: see "Guidelines Establishing Test Procedures for the Analysis of Poliutants", USEPA Federal Register Vol. 49 No. 209, October 1984.
(6)	Methods 500 through 599: see "Methods for the Determination of Organic Compounds in Drinking Water," USEPA 60074-887039, Rev. 1988.

1860 N. ELSTON AVENUE BASEMENT CLOSURE WIPES



Job #: 12557 Date : 04/21/92

Aces Maintenance P.O. Box 511 Wheaton, IL 60189

ATTN: Dan Coyne

Sampling Date: 04/07/92 Analyses Date: 04/10-21/92

Identification: Four samples taken by Dan Coyne identified as:

1860 N. ELSTON

Results follow:

Method: Standard Methods

Sample ID: 1860 N. ELSTON (NORTH WALL)

Association of the control of the second of

MDL (mg/Wipe) Analysis (mg/Wipe)

Total Chromium 0.01 BDL

Nickel 0.01 BDL

Sample ID: 1860 N. ELSTON (EAST WALL)

MDL (mg/Wipe) Analysis (mg/Wipe)

Total Chromium 0.01 BDL

Nickel 0,01 BDL

Job #: 12557 Page 2 of 2

Method: Standard Methods

Sample ID: 1860 N. ELSTON (SOUTH WALL)

en Aregoriense i Gerkation in die Schollen wie der Wasserbeite in 1990 in der

MDL (mg/Wipe)

Analysis (mg/Wipe)

BDL

Cyanide

Cyanide

0.05

Sample ID: 1860 N. ELSTON (WEST WALL)

MDL (mg/Wipe) Analysis (mg/Wipe)

0.05

BDL

MDL = Method Detection Limit . BDL = Below Detection Limit

Respectfully submitted,

Nicholas Cuzzone

Lab Manager

Quality Analytical Labs, Inc.

EXHIBIT 'E'

WASTE MANIFEST



HAZARUUUS WASIE WANIFES

(As Required By The Alabama Department of Environmental Management)

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Mr. James Moore, Chief Corrective Action Unit Bureau of Land Illinois Environmental Protection Agency 1021 North Grand Avenue East Springfield, Illinois 62702-3998

Re: Aero Plating Works ILD 005 125 836 DOJ Docket # 87-C-4491

Dear Mr. Moore:

The United States Environmental Protection Agencies (U.S. EPA) has yet to receive the closure certification for Aero Plating Works. According to FY 98 Performance Partner Agreement, RCRA closure activities by the Illinois Protection Agency (IEPA) should include reviewing and approving closure certifications. For this purpose the U.S. EPA is forwarding to IEPA the enclosed documents, released by ACES Environmental to (U.S. EPA) to support the review of the approval of closure certification.

Pursuant to the Order on the above referenced docket, the United States District Court, Northern District of Illinois, Eastern Division received judgements in its favor on October 30, 1987 and January 8, 1990. These judgements stated, in part that:

"Whereas, the judgement of October 30, 1987 required the facility closure plan. However, the facility closure plan has been approved by the IEPA and such closure will be undertaken by Seymor Shiner, the owner of the property."

The facility has indicated to U.S. EPA that closure has been undertaken and completed. Certification of such is attached to this letter, and U.S. EPA requests that IEPA to review the enclosed documents and acknowledge closure certification of this facility.

Thank you for the cooperation in this matter. If you have any questions, please contact George Opek of my staff at (312) 886-1423.

Sincerely yours,

Lorna Jereza, Chief Illinois/Indiana Section Enforcement and Compliance Assurance Branch

Enclosure

bcc: Section File

Branch File

DE-9J/GO:be/9/21/98/filename:jim2

ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH

SECRETARY PROPERTY	SECRETARY	SECRETARY	SECRETARY	SECRETARY	SECRETARY
AUTHOR/ TYPIST	MINN/OHIO SECTION CHIEF	MICHIGAN/ WISCONSIN SECTION CHIEF	ILLINOIS/ INDIANA SECTION CHIEF	ECAB BRANCH CHIEF	WPTD DIVISION DIRECTOR
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USEPA

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/524-3300

August 19, 1997

CERTIFIED MAIL P 344 343 625

Aeroplating Works
Attn: Mr. Seymour Shiner
2244 West Arthur
Chicago, Illinois 60645

Re: 0316230001 -- Cook County

Aeroplating Works ILD005125836 Log No. C-677-M-4 Received: July 11, 1997 RCRA Closure

Dear Mr. Shiner:

This is in response to the information submitted by facsimile on July 11, 1997 regarding RCRA closure activities at the above-referenced facility. This information was prepared and submitted by Aces Environmental on behalf of Aeroplating.

Specifically, the submitted information consisted of the results of recent soil sampling/analysis efforts conducted as part of the closure of the three hazardous waste management units at the facility ("Hazardous Waste Storage Arca," "Basement," and "Waste Water Pre-Treatment Equipment"). A plan to close these units was initially approved by Illinois EPA on May 23, 1994 (Log No. C-673-M-1); modifications to this plan were subsequently approved by Illinois EPA on February 9, 1996 (Log No. C-677-M-3). The subject submittal was reviewed as a closure modification request due to the fact it contained 1995 and 1996 soil sampling analyses results for the eastern part of the facility. The closure plan modification request for the above-referenced facility is hereby approved subject to the following conditions and modifications (it is understood that some of the requirements associated with these conditions and modifications may have been met):

- 1. Except as modified by the subject submittal and this letter, closure activities shall be carried out in accordance with the Illinois EPA letter dated February 9, 1996.
- 2. Aeroplating must collect soil samples continuously from a location onsite to a depth of at least 50' below grade surface (bgs). The soil samples must be visually inspected and a visual classification of each soil sample must be conducted in accordance with ASTM Method D-2488 and should be reported to Illinois EPA in a report by October 1, 1997. Attached is a field boring log sheet to be used for making recordings of the visual classification of each soil sample. The purpose of the soil boring and visual classification of the soils is to determine the geology and the depth to/of groundwater beneath the site. This information will be utilized for determining if the lead and zinc contamination beneath the castern part of the facility can be left

IEPA/LAND/PERMITS

Page 2

in place with the institutional controls of a concrete cap, a deed restriction, and modified survey plat showing the subject area of concern, similar to what was done at the "Hazardous Waste Storage Area" (see Conditions 2-6 of Illinois EPA's February 9, 1996 letter).

- The Illinois EPA should be notified within 2 weeks of the date of performing the visual 3. classification and drilling required, by notifying Gregg Sanders at 217/524-3308 so that an Illinois EPA representative may be present for observing the aforementioned activities.
- The results of the investigation required by Condition 3 should be submitted to Illinois EPA by 4. October 15, 1997. This information should be submitted in the form of a report developed in general accordance with the attached guidance document entitled Recommended Contents of RCRA Soil and/or Groundwater Investigation Reports.
- 5. The approval of this closure plan will not: (1) resolve any of this facility's possible violations of the Illinois Environmental Protection Act and/or 35 Ill. Adm. Code, Subtitle G: Waste Disposal; or (2) prevent the USEPA or Illinois EPA from pursuing enforcement proceedings and monetary penalties as a result of the afore-mentioned possible violations.
- The approval of this closure plan does not resolve any of this facility's possible violations of 35 IAC 725, Subpart II (Financial Requirements). Any such possible violation will not be resolved (and the facility will remain out of compliance) until: (1) adequate financial assurance is established; or (2) the Illinois EPA approves the certification of final closure for the facility.
- 7. The attached form entitled RCRA Interim Status Closure and Post-Closure Plans General Form (LPC-PA18) must be completed and accompany all information submitted to the Illinois EPA associated with the RCRA closure activities described in this letter. As noted on the form, two copies must accompany the original of all submittals, so that the information can be distributed to the appropriate Illinois EPA personnel, including regional offices.

Should you have any questions regarding this matter, please contact Gregg Sanders at 217/524-3308.

Sincerely.

Edwin C. Bakawski by Jkn Edwin C. Bakowski, P.E.

Manager, Permit Section

Bureau of Land

ECB:GS:bjh\971483\$.WPD

JUN Attachments:

IEPA Soil Boring Log

Recommended Contents of RCRA Soil and/or Groundwater Investigation Reports

cc: Aces Environmental USEPA, John Breslin Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/524-3300

February 9, 1996

Z 363 613 375

Aeroplating Works
Attn: Mr. Seymour Shiner
2244 West Arthur
Chicago, Illinois 60645

Re: 0316230004 -- Cook County

Aeroplating Works ILD005125836 Log No. C-677-M-3

Received: November 8, 1995; November 9, 1995; December 8, 1995

RCRA Closure

Dear Mr. Shiner:

This letter is in response to three document; recently submitted on your behalf by Aces Maintenance. Each of these submittals contained information regarding RCRA closure of three hazardous waste management units at the above-referenced facility referred to as "Hazardous Waste Storage Area", "Basement Storage Area", and "Wastewater Pretreatment Equipment".

The first of these three documents provided additional information about the unit referred to as "Hazardous Waste Storage Area". The other two documents contained soil sampling results from soil sampling events conducted at all three storage areas at the above-referenced facility. The subject submittal also contained a recommended source of action for completing closure of the subject hazardous waste management units.

The subject submittals were reviewed as requests to modify the approved final RCRA closure plan for the three hazardous waste management units identified above and are hereby approved subject to the following conditions and modifications:

- It appears that no additional soil investigations and no soil remediation beneath/surrounding the "Basement Storage Area" are necessary to ensure the closure performance standards of 35 IAC 725.211 and 725.214 are met.
- 2. Concentrations of lead remain in the soil beneath the "Hazardous Waste Storage Area" at the subject facility. These levels will not pose a threat to human health or the environment and closure meeting the requirements of 35 IAC 725.211, 725.214 and 725.297(a)(1) will be achieved provided:

- a. A concrete cover, or some other type of impermeable cover remains in place over the soil beneath this storage area;
- b. The cover is properly maintained;
- c. Restrictions are in place to limit direct human exposure to the soils beneath the area;
- d. A site safety plan to address possible worker exposure to the soils beneath the "Hazardous Waste Storage Area" must be developed and implemented for any future excavation/construction activities where workers may come into contact with the soil beneath the building;
- e. Any soil removed from beneath "Hazardous Waste Storage Area" during future activities must be managed at least as a special waste in accordance with 35 Ill. Adm. Code Subtitle G: Waste Disposal.
- f. A notation is placed in the deed for this property indicating that lead is present in the soil beneath the "Hazardous Waste Storage Area" and that the requirements set forth in Items 1 a through 1 e above are met.
- 3. As part of the closure activities, a survey plat must be developed which shows the location and dimensions of the building, relative to the legal boundaries of the site. The plat must be prepared and certified by a professional land surveyor and be developed with respect to permanently surveyed benchmark. The locations from which soil samples were collected from the "Hazardous Waste Storage Area" must also be shown on this plat.
- 4. The survey plat identified in Condition 3 above must contain a note, prominently displayed, which states that:
 - a. One hazardous waste management unit was once present at the facility. This unit was remediated in accordance with an IEPA approved closure plan. The IEPA determined that the units were properly remediated and that no further action was necessary, so long as this note was placed in the deed to the property and the requirements set forth in this note are met.
 - b. Lead remains in the soils beneath the "Hazardous Waste Storage Area";
 - c. The contaminants in the soils beneath the "Hazardous Waste Storage Area" pose no threat to human health and the environment provided:
 - 1. The concrete floor of the area or some other type of impoundment cover remains in place over the soil;

- 2. The cover is properly maintained;
- 3. Access to the area is restricted so that humans will not come into direct contact with the soils remaining beneath the "Hazardous Waste Storage Area";
- 4. A site safety plan to address possible worker exposure to the soils beneath the area must be developed and implemented for any future excavation/construction activities where workers may come into contact with the soil beneath the building;
- 5. A copy of the survey plat identified in Conditions 3 and 4 above must be:
 - a. Attached to the deed for the subject property, or on some other instrument which is normally examined during title search, which will in perpetuity notify any potential purchaser of the property of the requirements set forth in the notation identified in Condition 4 above.
 - b. Submitted to the Cook County Recorder, any local zoning authority, and any other authority with jurisdiction over land use.
- 6. A copy of the survey plat required by Conditions 3 and 4 above as well as documentation indicating that the requirements of Condition 5 above have been met must be included in the certification of closure required by Condition 8 below.
- 7. The vertical extent of lead contamination present toward the northeast part of the "Wastewater Pretreatment Equipment Area" needs to be defined at the former sample locations identified as "NE", "B₁", and "B₂". Note that the removal of lead contamination in this area may be necessary depending upon the results of additional soil investigations. Also note that, depending upon the results of additional soil investigations, the "Wastewater Pretreatment Equipment" area may be handled in a similar manner as the "Hazardous Waste Storage Area" and the requirements listed in Conditions 2 through 6 above. The results of the additional soil samples should be submitted to the Agency by March 30, 1996 in a format similar to Condition 18 of the Agency's previous letter to Acroplating dated May 23, 1994.
- 8. The requirements of Conditions 3 through 6 above should be executed by April 30, 1996, as they are the only activities necessary to complete closure of the "Hazardous Waste Storage Area".

9. Once the requirements of Conditions 3 through 7 above have been met and a final determination is made regarding the "Wastewater Pretreatment Equipment Area", certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved final closure plan must be submitted to the Agency for review and approval. This certification should be received at the Agency by July 1, 1996.

The attached closure certification form must be used. Signatures must meet the requirement of 35 Ill. Adm. Code Section 702.126. The independent engineer should be present at all critical, major points (activities) during the closure. These might include soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for the units approved for closure herein until the Agency approves the facility's closure certification.

The Illinois Professional Engineering Practice Act requires that any person who practices professional engineering in the State of Illinois or implies that he (she) is a professional engineer must be registered under the Illinois Professional Engineering Act (par. 5101, Section 1). Therefore, any certification or engineering services which are performed for a closure plan in the State of Illinois must be done by an Illinois P.E.

As part of the closure certification, to document the closure activities at the subject facility, please submit a Closure Documentation Report which includes:

- a. The volume of waste, waste residue and contaminated soil (if any) removed, including wastes resulting from decontamination activities. Actual disposition of this waste must also be described;
- b. Scaled drawings showing the horizontal and vertical boundaries from which any contaminated soil was removed:
- c. A description of the method of waste handling and transport;
- d. Waste manifest numbers;
- e. Copies of the waste manifests;
- f. A description of the sampling and analytical methods used including sample preservation methods and chain-of-custody information;
- g. A chronological summary of closure activities and the cost involved;

- h. Color photo documentation of the subject area/activities before, during and after closure; and
- i. Information documenting the results of all soil sampling/analysis efforts. The goal of presenting this information should be to describe, in a logical manner, the activities and results associated with the sampling/analysis effort. At a minimum, this information must include:
 - 1. Identification of the reason for the sampling/analysis effort and the goals of the effort;
 - 2. A summary in tabular form of all analytical data, including all quality assurance/quality control data;
 - 3. A scaled drawing showing the horizontal and vertical locations where all soil samples were collected;
 - 4. A description of the soil sampling procedures, sample preservation procedures and chain of custody procedures;
 - 5. Identification of the test method used and detection limits achieved, including sample preparation, sample dilution (if necessary) and analytical inferences;
 - 6. Copies of the laboratory report sheets;
 - 7. Visual classification of each soil sample in accordance with ASTM D-2488; and
 - 8. A discussion of the data, as it relates to the overall goal of the sampling/analysis effort.
- j. The information required by Condition 6 above.

In providing this information, Aeroplating need only summarize previously submitted information and then incorporate by reference and information previously submitted to the Agency. When referencing such information, the following should be identified: (1) date of submittal; (2) name of submitter; (3) person to whom it was submitted; (4) name of document submitted (if appropriate); and (5) page on which information being referenced is located.

9. The original and two (2) copies of all certifications, logs or reports which are required to be submitted to the Agency by the permittee should be mailed to the following address:

Illinois Environmental Protection Agency Division of Land Pollution Control -- #33 Permit Section 2200 Churchill Road Post Office Box 19276 Springfield, Illinois 62794-9276

Should you have any questions regarding this matter, please contact Gregg Sanders at 217/524-3300.

Sincerely,

Edwin C. Bakowski

Edwin C. Bakowski, P.E. Manager, Permit Section Bureau of Land

ECB:GS:bjh\963643S.WPD

Attachment: Closure Certification Statement

bcc: Bureau File Maywood Region Jim Moore Gregg Sanders

- 2. The cover is properly maintained;
- 3. Access to the area is restricted so that humans will not come into direct contact with the soils remaining beneath the "Hazardous Waste Storage Area";
- 4. A site safety plan to address possible worker exposure to the soils beneath the area must be developed and implemented for any future excavation/construction activities where workers may come into contact with the soil beneath the building;
- 5. A copy of the survey plat identified in Conditions 3 and 4 above must be:
 - a. Attached to the deed for the subject property, or on some other instrument which is normally examined during title search, which will in perpetuity notify any potential purchaser of the property of the requirements set forth in the notation identified in Condition 4 above.
 - b. Submitted to the Cook County Recorder, any local zoning authority, and any other authority with jurisdiction over land use.
- 6. A copy of the survey plat required by Conditions 3 and 4 above as well as documentation indicating that the requirements of Condition 5 above have been met must be included in the certification of closure required by Condition 8 below.
- 7. The vertical extent of lead contamination present toward the northeast part of the "Wastewater Pretreatment Equipment Area" needs to be defined at the former sample locations identified as "NE", "B₁", and "B₂". Note that the removal of lead contamination in this area may be necessary depending upon the results of additional soil investigations. Also note that, depending upon the results of additional soil investigations, the "Wastewater Pretreatment Equipment" area may be handled in a similar manner as the "Hazardous Waste Storage Area" and the requirements listed in Conditions 2 through 6 above. The results of the additional soil samples should be submitted to the Agency by March 30, 1996 in a format similar to Condition 18 of the Agency's previous letter to Acroplating dated May 23, 1994.
- 8. The requirements of Conditions 3 through 6 above should be executed by April 30, 1996, as they are the only activities necessary to complete closure of the "Hazardous Waste Storage Area".

Once the requirements of Conditions 3 through 7 above have been met and a final determination is made regarding the "Wastewater Pretreatment Equipment Area", certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved final closure plan must be submitted to the Agency for review and approval. This certification should be received at the Agency by July 1, 1996.

The attached closure certification form must be used. Signatures must meet the requirement of 35 Ill. Adm. Code Section 702.126. The independent engineer should be present at all critical, major points (activities) during the closure. These might include soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for the units approved for closure herein until the Agency approves the facility's closure certification.

The Illinois Professional Engineering Practice Act requires that any person who practices professional engineering in the State of Illinois or implies that he (she) is a professional engineer must be registered under the Illinois Professional Engineering Act (par. 5101, Section 1). Therefore, any certification or engineering services which are performed for a closure plan in the State of Illinois must be done by an Illinois P.E.

As part of the closure certification, to document the closure activities at the subject facility, please submit a Closure Documentation Report which includes:

- a. The volume of waste, waste residue and contaminated soil (if any) removed, including wastes resulting from decontamination activities. Actual disposition of this waste must also be described;
- Scaled drawings showing the horizontal and vertical boundaries from which any contaminated soil was removed;
- c. A description of the method of waste handling and transport;
- d. Waste manifest numbers;
- e. Copies of the waste manifests;
- f. A description of the sampling and analytical methods used including sample preservation methods and chain-of-custody information;
- g. A chronological summary of closure activities and the cost involved;

- h. Color photo documentation of the subject area/activities before, during and after closure; and
- i. Information documenting the results of all soil sampling/analysis efforts. The goal of presenting this information should be to describe, in a logical manner, the activities and results associated with the sampling/analysis effort. At a minimum, this information must include:
 - Identification of the reason for the sampling/analysis effort and the goals of the effort;
 - 2. A summary in tabular form of all analytical data, including all quality assurance/quality control data;
 - 3. A scaled drawing showing the horizontal and vertical locations where all soil samples were collected;
 - 4. A description of the soil sampling procedures, sample preservation procedures and chain of custody procedures;
 - 5. Identification of the test method used and detection limits achieved, including sample preparation, sample dilution (if necessary) and analytical inferences;
 - 6. Copies of the laboratory report sheets;
 - 7. Visual classification of each soil sample in accordance with ASTM D-2488; and
 - 8. A discussion of the data, as it relates to the overall goal of the sampling/analysis effort.
- j. The information required by Condition 6 above.

In providing this information, Aeroplating need only summarize previously submitted information and then incorporate by reference and information previously submitted to the Agency. When referencing such information, the following should be identified: (1) date of submittal; (2) name of submitter; (3) person to whom it was submitted; (4) name of document submitted (if appropriate); and (5) page on which information being referenced is located.

9. The original and two (2) copies of all certifications, logs or reports which are required to be submitted to the Agency by the permittee should be mailed to the following address:

Illinois Environmental Protection Agency.
Division of Land Pollution Control -- #33
Permit Section
2200 Churchill Road
Post Office Box 19276
Springfield, Illinois 62794-9276

Should you have any questions regarding this matter, please contact Gregg Sanders at 217/524-3300.

Sincerely,

Edwir C. Bakowski, P.E.

Manager, Permit Section

Bureau of Land

ECB:GS:bjh\963643S.WPD

Attachment: Closure Certification Statement

bcc: Bureau File

Maywood Region

Jim Moore Gregg Sanders Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/524-3300

May 23, 1994

Mr. Seymour Shiner 2244 West Arthur Chicago, Illinois 60645

Re: 0316230004 -- Cook County

Aero Plating ILD005125836 Log No. C-677-M-1

Received: February 22, 1994

RCRA Closure

Dear Mr. Shiner:

The closure plan prepared and submitted by Aces Maintenance on behalf of Aero Plating has been reviewed by this Agency. Your final closure plan to close the areas beneath/adjacent to the areas referred to as "Hazardous Waste Storage Area," "Basement," and "Waste Water Pre-Treatment Equipment" within the subject submittal is hereby approved subject to the following conditions and modifications (it is understood that some of the requirements associated with these conditions and modifications may have been met):

- 1. This approval letter shall supersede the previous Agency letter dated February 11, 1993.
- 2. Except as modified by this letter, closure activities shall be carried out in accordance with the above referenced closure plan.
- 3. Closure activities must be completed by April 1, 1995. When closure is complete the owner or operator must submit to the Agency certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. This certification must be received at this Agency within sixty (60) days after closure, or by June 1, 1995. These dates may be revised if Aero Plating finds that additional time is necessary to complete all required closure activities and demonstrates to the Agency that it is attempting to complete closure in a timely manner.

The attached closure certification form must be used. Signatures must meet the requirements of 35 Ill. Adm. Code Section 702.126. The independent engineer should be present at all critical, major points (activities) during the closure. These might include soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for the units approved for closure herein until the Agency approves the facility's closure certification.

The Illinois Professional Engineering Act (III. Rev. Stat., Ch. 111, par. 5101 et. seq.) requires that any person who practices professional engineering in the State of Illinois or implies that he (she) is a professional engineer must be registered under the Illinois Professional Engineering Act (par. 5101, Sec. 1). Therefore, any certification or engineering services which are performed for a closure plan in the State of Illinois must be done by an Illinois P.E.

Plans and specifications, designs, drawings, reports, and other documents rendered as professional engineering services, and revisions of the above must be sealed and signed by a professional engineer in accordance with par. 5119, sec. 13.1 of the Illinois Professional Engineering Act.

As part of the closure certification, to document the closure activities at your facility, a Closure Documentation Report which must be submitted which includes the following:

- a. The volume of waste, waste residue and contaminated soil (if any) removed. The term waste includes wastes resulting from decontamination activities.
- b. Scaled drawings showing the horizontal and vertical boundaries of the extent of any soil removal effort.
- c. A description of the method of waste handling and transport.
- d. The waste manifest numbers.
- e. Copies of the waste manifests.
- f. Information documenting the results of all sampling/analysis efforts. The goal of presenting this information should be to describe, in a logical manner, the activities and results associated with the sampling/analysis effort. At a minimum, this information must include:
 - identification of the reason for the sampling/analysis effort and the goals of the effort;
 - a summary in tabular form of all analytical data, including all quality assurance/quality control data;
 - a scaled drawing showing the horizontal location from which all soil samples were collected;
 - 4. identification of the depth and vertical interval from which each sample was collected;
 - 5. a description of the soil sampling procedures, sample preservation procedures and chain of custody procedures;

- identification of the test method used and detection limits achieved, including sample preparation, sample dilution (if necessary) and analytical inferences;
- copies of the final laboratory report sheets, including final sheets reporting all quality assurance/quality assurance dates;
- 8. visual classification of each soil sample in accordance with ASTM D-2488;
- 9. a summary of all procedures used for quality assurance/quality control, including the results of these procedures; and
- 10. a discussion of the data, as it relates to the overall goal of the sampling/analysis effort.
- g. Color photo documentation of closure. Document conditions before, during and after closure; and
- h. A chronological summary of closure activities and the cost involved.

The original and two (2) copies of all certifications, logs, or reports which are required to be submitted to the Agency by the facility should be mailed to the following address:

Illinois Environmental Protection Agency Bureau of Land -- #33 Permit Section 2200 Churchill Road Post Office Box 19276 Springfield, Illinois 62794-9276

- 4. Remediation as proposed for the area beneath/near the area indicated as "Hazardous Waste Storage Area" on page 33 of Exhibit B in the subject submittal is approved except as modified by this letter.
- 5. The results of the remediation activities conducted at the site shall be submitted within the report referred to in Condition 18. The format for reporting these results should be similar to the format specified in Condition 18.
- 6. The top of the concrete pad utilized to store hazardous waste at the "Hazardous Waste Storage Area" shall be scraped and/or brushed to remove any residue adhering to the concrete. Once scraped the surface shall be steam-cleaned and triple rinsed. All scrapings, wash water and rinse water shall be collected and analyzed for the constituents identified in Condition 19 and the characteristics of hazardous waste as set forth in 35 IAC 721, Subpart C. If the analyses detects the presence of any constituent above the PQL, then that material must be managed as a hazardous waste. If the materials exhibit any characteristics of a hazardous waste, then they must be managed as a hazardous waste. At a minimum, the materials must be managed as a special waste. The bottom of the concrete pad utilized to store hazardous waste

shall be scraped and/or brushed to remove all material adhering to it. Once the top and bottom of the concrete pad have been cleaned in accordance with these procedures, the pad may be disposed as construction debris.

- The Agency acknowledges that the necessary decontamination efforts thus far required at the subject facility have been carried out satisfactorily.
- 8. Additional information regarding the soil sample locations and depths of the former sample locations collected in 1991 near/beneath the area indicated, on page 33 in Exhibit B of the subject submittal, as "Wastewater Pre-Treatment Equipment", should be provided within the report referred to in Condition 18. Specifically, the previous sampling activities should be presented in accordance with the procedures described in 18.c, 18.d, 18.e and 18.g.
- 9. The sampling analysis results within the May 15, 1992 submittal for the area near/beneath the "Wastewater Pre-Treatment Equipment" indicated that nickel contamination was present at one of the former sample locations collected in 1991 at the intervals of 0-6" and 6-12" beneath the backfill/natural soil interface. The horizontal locations of the samples collected in 1991 were not indicated within the subject submittal. One (1) additional soil sample should be collected at a deeper interval at the location where nickel contamination was present (i.e. 18-24" or 30-36"). This sample must be analyzed for nickel and the remaining parameters listed in Condition 19 which were not analyzed for in the 1991 sampling analysis. Note that the goal of this effort is to demonstrate that the nickel contamination is vertically limited and also to confirm that the remaining constituents of concern listed in Condition 19, which were not analyzed for in the 1991 analysis and which have been previously detected in the soils at the site, are not present at concerning levels.
- 10. The goal of the soil sampling and analysis effort described below is to demonstrate that the area near/beneath the "Wastewater Pre-Treatment Equipment," identified on page 33 in Exhibit B of the subject submittal, does not contain soils contaminated with the constituents listed in Condition 19 at concerning levels.
 - a. Soil sample(s) should be collected from an additional two (2) locations near the previous location referred to as "Wastewater Pre-Treatment Equipment". One of these locations should be approximately 25' south of former boring location "Boring #5" identified on page 50 in Exhibit B of the subject submittal. The other location should be approximately 25' north of former boring location "Boring #6" identified on page 50 in Exhibit B of the subject submittal. These soil samples should be analyzed for all of the constituents listed in Condition 19 of this letter. The interval of these samples should be approximately 6-12" beneath the backfill/natural soil interface.
 - b. One (1) sample should be collected near <u>both</u> former sample locations "Boring #5" and "Boring #6" and analyzed for the constituents which were not analyzed for (in the 1993 analysis)

that are listed in Condition 19 (total of two sample locations). The interval of these samples should be approximately 6-12" beneath the backfill/natural soil interface.

- 11. Additional soil sampling and analysis should be conducted in the manner below for the area beneath the "Basement," identified on page 48 in Exhibit B of the subject submittal (note that the Agency is aware of the concerns regarding maintaining the buildings structural integrity which could be compromised if excavation occurred beneath the basement.)
 - a. Demonstrate that the soil is not contaminated with constituents which were not analyzed for that are listed in Condition 19;
 - b. One (1) sample should be collected near the former boring collected in 1991 where nickel contamination was detected. The interval of this sample should be deeper than the former 1991 sample. This sample should be analyzed for nickel and those constituents listed in Condition 19 which were not analyzed for in the 1991 analysis; and
 - c. One (1) sample should be collected near the former 1993 locations of "Boring No. 1", "Boring No. 2," "Boring No. 3," and "Boring No. 4" (four (4) samples total). The interval of these samples should be approximately 6-12" beneath the backfill/natural soil interface. These samples should be analyzed for those constituents listed in Condition 19 which were not analyzed for in the 1993 analysis.
- 12. The following procedure must be utilized in the collection of all required soil samples:
 - a. The procedures used to collect the soil samples must be sufficient so that all soil encountered is classified in accordance with ASTM Method D-2488.
 - b. If a drill rig or similar piece of equipment is necessary to collect required soil samples, then:
 - the procedures specified in ASTM Method D-1586 (Split Spoon Sampling) or D-1587 (Shelby Tube Sampling) must be used in collecting the samples.
 - 2. Soil samples must be collected continuously at several locations to provide information regarding the shallow geology of the area where the investigation is being conducted;
- 13. Any soil samples which will be analyzed for volatile organic compounds from the excavation at the "Hazardous Waste Storage Area" must be collected in accordance with Attachment 7 of the Agency's RCRA closure plan instructions;

- 14. All other soil samples must be collected in accordance with the procedures set forth in SW-846;
- 15. When visually discolored or contaminated material exists within an area to be sampled and if cracks or construction joints that are not watertight are present then horizontal placement of sampling locations shall be adjusted to include such areas. Sample size per interval shall be minimized to prevent dilution of any contamination.
- 16. Quality assurance/quality control procedures which meet the requirements of SW-846 must be implemented during all required sampling/analysis efforts.
- 17. All soil samples shall be analyzed individually (i.e., no compositing). Analytical procedures shall be conducted in accordance with <u>Test Methods for Evaluating Solid Wastes</u>, Third Edition (SW-846). When a SW-846 (Third Edition) analytical method is specified, all the chemicals listed in the Quantitation Limits Table for that method shall be reported unless specifically exempted in writing by the Agency. Apparent visually contaminated material within a sampling interval shall be included in the sample portion of the interval to be analyzed. To demonstrate a parameter is not present in a sample, analysis results must show a detection limit at least as low as the PQL for that parameter in the third edition of SW-846. For inorganic parameters, the detection limit must be at least as low as the RCRA Groundwater Detection Limits, as referenced in SW-846 (Third Edition) Volume 1A, pages TWO-29 and TWO-30, Table 2-15.
- 18. A report documenting the results of the required sampling/analysis referred to in Conditions 5, 9, 10, 11, 15, 17, 19, 20, 26 and 27 must be submitted to the Agency by September 16, 1994. This report must include:
 - a. identification of the reason for the sampling/analysis effort and the goals of the effort;
 - b. a summary in tabular form of all analytical data, including all quality assurance/quality control data;
 - c. a scaled drawing showing the horizontal location and vertical interval from which all soil samples were collected;
 - d. plan view drawings, that are easily cross-referenced with drawings referred to in Condition 18 Item c which identify the constituents concentration at each location which are detected above the corresponding concentrations in Condition 19 of this letter. Note that the constituents and concentrations that should be identified in the above manner should be from all past soil investigations.
 - e. The vertical intervals that have been analyzed for all parameters in Condition 19 and achieve the soil concentrations for all constituents listed in Condition 19 should also be identified in the drawings referred to in Item d above.

- f. The constituents that are listed in Condition 19 but not analyzed for should be noted for all samples in the drawings referred to in Item d above.
- g. a description of the soil sampling procedures, sample preservation procedures and chain of custody procedures;
- h. identification of the test method used and detection limits achieved, including sample preparation, sample dilution (if necessary) and analytical inferences;
- i. copies of the final laboratory report sheets, including final sheets reporting all quality assurance/quality assurance dates;
- visual classification of each soil sample in accordance with ASTM D-2488;
- k. a summary of all procedures used for quality assurance/quality control, including the results of these procedures; and
- a discussion of the data, as it is related to the overall goal of the sampling/analysis effort.

- 20. The Agency shall be notified in writing if contaminants not listed in Condition 19 are detected above their respective practical quantitation limit. This notification shall identify the additional constituents detected and the concentration at which they were detected. The Agency will review this information and provide soil concentrations, similar to the manner in Condition 19, for the newly detected contaminants, if necessary. The sampling and analysis effort being carried out to determine the extent of contamination shall not be delayed while the Agency is reviewing this information.
- 21. The attached form entitled <u>RCRA Interim Status Closure and Post-Closure Care Plans General Form</u> (LPC-PAI8) must be completed and accompany all information submitted to the Agency associated with the closure activities described in this letter. As noted on this form, two copies must accompany the original of all submittals, so that the information submitted can be distributed, as necessary to Agency personnel and regional offices.
- 22. If groundwater is encountered during any soil sampling activities or soil removal effort prior to reaching soil which meets the concentrations listed in Condition 19, then a plan to investigate for potential groundwater contamination must be submitted to the Agency for review and approval. Such a plan must be submitted within sixty (60) days after the date that the analytical results are received which indicate that soil contamination extends to the water table. In addition, the Agency shall be notified in writing of this discovery within five (5) days after these analytical results are received.
- 23. If it is determined that soil excavation and off-site disposal is not the preferred remedial action for this closure, then the Agency must be notified in writing when such a determination is made. At that time, the Agency will provide additional guidance regarding the information which must be submitted to the Agency for review and approval relative to the alternative remedial action which the facility would like to implement.
- 24. Contaminated soil may be excavated and disposed off-site at any time during closure. The goal of any such effort should be to remove all soil which exceeds the concentrations listed in Condition 19.
- 25. If removal and off-site disposal is the remedial action chosen for any soil contamination found, then all contaminated soil which is excavated for off-site disposal must be managed as hazardous waste in accordance with 35 IAC 722, 723, 728 and 809, as well as all applicable federal requirements.
- 26. If removal and off-site disposal is the remedial action chosen for any soil contamination found, then soil samples must be collected for analysis from the bottom and sidewalls of the <u>final</u> excavation from which contaminated soil was removed. The sampling analysis effort described below is necessary to demonstrate that the remaining soil meets the concentrations listed in Condition 19.

- a. A grid system as set forth in Section 13.b of the Agency's closure plan instructions must be established over the excavation.
- b. Samples must be collected from the floor of the excavation at each grid intersection, including intersections along the perimeter of the excavation.
- c. Samples must be collected 6"-12" below the ground surface at each grid intersection around the excavation perimeter. Samples must also be collected at the midpoint of the excavation wall at each grid intersection along the excavation perimeter.
- d. Samples must be analyzed for all constituents listed in Condition 19.
- e. Collection/analysis of all required samples must be in accordance with the procedures approved in this letter.
- f. Soil samples to be analyzed for volatile organic compounds shall be collected using Attachment 7 of the Agency's RCRA closure plan instructions. In addition, such samples must be collected 6"-12" beneath the floor/sidewalls of the excavation to minimize the possibility of volatilization of the contaminants prior to the collection of the samples.
- g. No random sampling shall be conducted to verify that the cleanup objectives have been met.
- 27. If removal and off-site disposal is the remedial action chosen for any soil contamination found, then additional soil must be removed, as necessary, until it can be demonstrated that the remaining soil in and around the area of concern meets the concentrations listed in Condition 19. Additional samples must be collected and analyzed in accordance with Condition 26 above from areas where additional soil has been removed.
- 28. All references to the "Agency's RCRA closure plan instructions" refer to the document entitled <u>Instructions for the Preparation of Closure Plans for Interim Status RCRA Hazardous Waste Facilities</u>, December 11, 1990. A copy of this document is enclosed.
- 29. If the Agency determines that implementation of this closure plan fails to satisfy the requirements of 35 Ill. Adm. Code, Section 725.211, the Agency reserves the right to amend the closure plan. Revisions of closure plans are subject to the appeal provisions of Section 40 of the Illinois Environmental Protection Act.
- 30. Under the provisions of 29 CFR 1910 (51 FR 15,654, December 19, 1986), cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination and training.

General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of 40 hours of safety and health training off site plus a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.

- 31. 35 IAC 721.131 F001 through F005 wastes must be disposed in accordance with 35 IAC Part 728.
- 32. To avoid creating another regulated storage unit during closure, it is recommended that you obtain any necessary permits for waste disposal prior to initiating excavation activities. If it is necessary to store excavated hazardous waste on-site prior to off-site disposal, do so only in containers or tanks for less than ninety (90) days. Do not create regulated waste pile units by storing the excavated hazardous waste in piles. The ninety (90) day accumulation time exemption (35 IAC 722.134) only applies to containers and tanks.
- 33. All hazardous wastes that result from this project are subject to annual reporting as required in 35 IAC 722.141 and shall be reported to the Agency by March 1 of the following year for wastes treated and left on-site or shipped off-site for storage, treatment and/or disposal during any calendar year. Additional information and appropriate report forms may be obtained from the Agency by contacting:

Facility Reporting Unit
Bureau of Land
Illinois Environmental Protection Agency
2200 Churchill Road
P.O. Box 19276
Springfield, Illinois 62794-9276

Should you have any questions regarding this matter, please contact Gregg Sanders at 217/524-3308.

Sincerely,

Douglas W. Clay by Jkn Douglas W. Clay, P.E.

Hazardous Waste Branch Manager Permit Section, Bureau of Land

DWC:GS/bst/sp288W/1-10

Attachment: Certification Statement

Closure Plan Preparation Guidance

cc: Aces Maintenance

USEPA Region V -- George Hamper

bcc: Bureau File Maywood Region Jim Moore Gregg Sanders July 20, 1994

Mr. John Breslin, Attorney
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 5
77 West Jackson, C-30A
Chicago, Illinois 60604

RE: 1850 and 1860 North Elston Avenue (Seymour Shiner's Property)

Dear Mr. Breslin:

On behalf of Mr. Shiner, let me pass along his thanks for your efforts in attempting to collect environmental clean-up cost from Mr. Lou Maiorano. The following costs are broken down into two parts: past clean-up costs and projected future clean-up costs. To date, sampling cost, remediation cost, engineering cost, and consultant fees have reached approximately \$19,000.00 (nineteen thousand dollars). This figure does not include the original \$10,000.00 (ten thousand dollars) that was distributed to suburban laboratories and Mr. Maiorano's attorney. Additional samples requested by the IEPA, closure sampling cost, should run approximately \$10,000.00 (ten thousand dollars). The actual contracting remediation work to clean-up the sterilizing room and previous storage room location are estimated to run approximately \$24,000,00 (twenty four thousand dollars). The highest part of that cost will be removing hazardous material to, either, an appropriate Landfill or Incinerator outside the Chicago area. Finishing closure documentation should run approximately \$5,000.00 (five thousand dollars). These figures total \$39,000.00 (thirty nine thousand dollars) which is an approximation of the final cost to complete clean-up and closure of this facility. I believe an additional \$5,000.00 (five thousand dollars) would be in order for miscellaneous and unanticipated cost and Aces Environmental can conclude that the project should be wrapped up for approximately \$44,000 (forty four thousand dollars).

Thank you for your cooperation in this matter.

Sincerely,

Daniel T. Coyne
Daniel T. Coyne

President

DTC/mns

P.O. Box 737 • Warrenville, Illinois 60555 • (708) 690-0189 • Fax (708) 682-1858



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

SEP 3 0 1993

Daniel E. May Assistant U.S. Attorney Everett McKinley Dirksen Building Room 1500 S 219 South Dearborn St. Chicago, IL 60604

Re: <u>U.S. v. Maiorano</u>

Civil Action No. 87-C-4491

Dear Mr. May:

This letter will reflect EPA's understanding of the current strategy shared by our respective offices in proceeding with the resolution of the above-captioned case. Specifically, today you and I discussed our plans for attaining a cash settlement with Mr. Louis Maiorano.

Mr. Seymour Shiner, the owner of the two properties in question (1850 and 1860 N. Elston in Chicago), is preparing a sampling work plan for submittal to Illinois EPA, through his consultant, Dan Coyne of Aces Maintenance. This plan was due on September 15 in draft form, but IEPA allowed an extension (after discussions with Mr. Coyne) in order that the document would would be more complete upon submittal. IEPA predicts that within a month or so it will be able to provide an estimate of the total cost of closing the site. Any actual remediation which will occur is planned to occur in early 1994.

It is U.S. EPA's view that the government should extract whatever payment possible from Mr. Maiorano to contribute to the cost of closure. You mentioned that Mr. Maiorano's attorney, Rod Jacobs, told you his client is willing to contribute toward the price of closure. Mr. Jacobs apparently envisions that any such contribution would be in the neighborhood of \$10,000. U.S. EPA's most recent information indicates that the cost of closure may exceed \$50,000. It that case, it is our view that Mr. Maiorano should be required to contribute significantly more that \$10,000. This is primarily because Mr. Maiorano caused the contamination in the buildings as operator of a facility which generated hazardous waste, and he was the subject of a federal court order requiring him to close the sites. Mr. Shiner, although he is also liable for closure under RCRA, is merely the owner of the

buildings, and did not own either building until the time when the Maioranos were ceasing operations. Given the enforcement discretion inherent in pursuing resolution of this case, U.S. EPA believes it important not to allow Mr. Maiorano to avoid his legal obligation to close these sites.

Procedurally, you and I agreed that you would take the lead on initiating settlement discussions with Mr. Jacobs. A prerequisite is that Department of Justice agrees to pursue a contempt action against Maiorano—in accordance with EPA's June 22, 1990 referral—if Maiorano refuses to settle. The discussions with Mr. Jacobs will commence after EPA provides you with technical information on the nature of the closure, including the estimated cost thereof. Assuming Department of Justice and EPA agree to any settlement, we envision entry of a Satisfaction and Release, whereby Mr. Maiorano would be released from his obligation to close the facility under the October 28, 1987 Court Order in exchange for a payment to be applied toward Mr. Shiner's closure expenses.

This course of action assumes that Mr. Shiner will carry out his expressed intent to close the sites in accordance with IEPA's requirements and in a reasonable time frame. As far as I can tell, based on discussions with Mr. Shiner, his consultant, and IEPA, Mr. Shiner does plan on following through with the closure.

Please contact me and let me know the results of any further discussions within DOJ or with any questions or comments.

Sincerely,

John J.\Breslin

Assistant Regional Counsel

cc: Deb Garber

Barbara Russell, HRE-8J

Steve Willey, DOJ

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Seymour Shiner 2244 W. Arthur Chicago, Illinois 60645

> Re: Notice of Violation Aero Plating Works, Inc. 1850 and 1860 N. Elston Chicago, Illinois ILD 005 125 836

Dear Mr. Shiner:

The United States Environmental Protection Agency (U.S. EPA) has repeatedly requested that you submit an amended closure plan to the Illinois Environmental Protection Agency for approval so that closure can be accomplished at the above-referenced facility.

We understand that during a meeting at the site of Aero Plating Works Inc., this past August with Mr. John Breslin of the U.S. EPA and Mr. Greg Sanders of the Illinois Environmental Protection Agency (IEPA), you agreed to submit an amended closure plan to the IEPA for approval. You had previously submitted a draft closure plan on November 13, 1992; however, that closure plan was disapproved by the IEPA with comments by letter of February 11, 1993.

To date you have not resubmitted the amended closure plan for approval. Failure to submit the amended closure plan constitutes noncompliance with Section 725.212 of Chapter 35 of the Illinois Administrative Code, 35 IAC 725.212 (see also Section 265.112 of Chapter 40 of the Code of Federal Regulations, 40 CFR 265.112).

You are hereby requested to submit the approvable closure plan to the IEPA, with a copy to Barbara Russell, U.S. EPA, HRE-8J, 77 W. Jackson Boulevard, Chicago, Illinois 60604. Persons in noncompliance with certain requirements of the Resource Conservation and Recovery Act may be subject to Federal enforcement action, including the assessment of penalties up to \$25,000 per day for each violation.

If you have any questions regarding this correspondence, please contact Ms. Barbara Russell of my staff at (312) 353-7922 or Mr. John Breslin at (312) 886-7165.

Sincerely yours,

Joseph M. Boyle, Chief RCRA Enforcement Branch

cc: Larry Eastep, IEPA
Glen Savage, IEPA
Greg Sanders, IEPA
William Radlinski, IEPA

bcc: J. Breslin File From: BRESLIN, JOHN (JBRESLIN)

To: r5rcra:brussell

Date: Monday, January 3, 1994 1:26 pm

Subject: Mairano

DOJ is reluctant to pursue contempt because they think it would be unlikely to succeed before a judge. They reason as follows: Maiorano has already paid \$100,000 to satisfy the judgment; Maiorano no longer has access to the facility, so a judge cannot order him to close the facility; and too much time has elapsed since the judgment (three years). DOJ has felt that having Mr. Shiner close the facility makes the most sense, and has refused to pursue the contempt, opting instead to monitor Shiner's progress. As I previously mentioned, we are waiting for Shiner to provide the final closure plan to Illinois EPA, so we can get a cost estimate, which will give us a concrete basis to pursue discussions with Maiorano. Let me know if we can have a meeting this week; my section chief Deb Garber has sais she's available the entire week. Thanks, JB

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Seymour Shiner 2244 W. Arthur Chicago, Illinois 60645

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If you have any questions regarding this correspondence, please contact Ms. Barbara Russell of my staff at (312) 353-7922 or Mr. John Breslin at (312) 886-7165.

Sincerely yours,

Joseph M. Boyle, Chief RCRA Enforcement Branch

cc: Larry Eastep, IEPA
Glen Savage, IEPA
Greg Sanders, IEPA
William Radlinski, IEPA

bcc: J. Breslin

File

B.RUSSELL:ev:01/25/94:DISK #:FILENAME:shiner

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SIGNATURE INITIAL CONCURRENCE REQUESTED - RCRA ENFORCEMENT BRANCH (REB)									
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From: BRESLIN, JOHN (JBRESLIN)

To: r5rcra:brussell

Date: Tuesday, December 28, 1993 9:53 am

Subject: Maiorano

Here is an update on the Maiorano/Aero-Plating situation. Generally, the situation has not been resolved, and I am requesting a meeting between you, me, and your supervisors as necessary.

You recall that in 1991 we had an internal meeting and decided to continue our pursuit of Mr. Maiorano, the former operator of the Aero-Plating facility, located at 1850-1860 N. Elston. previously referred a request for contempt action to the U.S. DOJ has not acted on the referral and is reluctant to do There have been several different Assistant U.S. Attorneys asigned to the case, and this has made it difficult to elicit a definite opinion of the case from DOJ. However, it has been the view of DOJ that the closure of the facility--and the resolution of the court case--would be most expeditiously accomplished through the voluntary efforts of Mr. Seymour Shiner, the owner of the buildings which once contained the Aero-Plating facility. Mr. Shiner has repeatedly told us over the last two years that he is (through his consultant) developing a closure plan for the facility. The most recent developments are not encouraging. Shiner promised us at a site visit in August that he would submit a final closure report to IEPA in September. IEPA later allowed an extension until October. The report still has not been submitted, and Mr. Shiner has not provided an explanation or any notification regarding the status of the report. I called Mr. Shiner's consultant, and he--per usual--said it was just about to be wrapped up and sent in. We have heard this very many times before.

It seems to me that we have little choice at this point but to pursue Mr. Shiner through an administrative action. Please forward this message to your management and get back to me at your convenience. Thanks, JB

CC: dgarber

From: I

BRESLIN, JOHN (JBRESLIN)

To: Date: R5ORC1:R5ARD:R5IMB:R5RCRA:BRUSSELL Tuesday, August 24, 1993 3:33 pm

Subject:

Aero Services -Reply

The State and Mr. Shiner have agreed on a scheduled for submittal of a final closure plan for the site. A draft will be submitted on Sept. 15, the state will comment within 30 days, and then the final draft will be submitted by November 15. I need to talk to you and Joe Boyle regarding our plans to pursue Mr. Maiorano

Will you find out for me when Mr. Shiner took over ownsehsiop of the site? There are two buildings--1850 & 1860 N. Elston.

From: BRESLIN, JOHN (JBRESLIN)

To: R5ORC1:R5ARD:R5IMB:R5RCRA:BRUSSELL Date: Thursday, May 27, 1993 7:58 am

Date: Thursday, May 27, 1993 7:58 am Subject: AERO PLATING STATUS -Reply

IEPA did not approve the closure plan; it sent Mr. Shiner (the site owner) a letter containing comments about what is necessary before IEPA could approve the plan Shiner just submitted a letter to IEPA seeking clarification. We do know that Maiorano Jr. is in the suburbs, and his dad is probably in Florida.

Something needs to be done on this soon. Why don't you talk to Joe Boyle and see if he is willing to reconsider his previous position that we should not commence enforcement ation against Mr. Shiner. Also, find out what Joe's views about this are in general; we still could push our contempt action agains thte Maioranos in federal court. Thanks. JB



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

MAR 1 6 1992

REPLY TO THE ATTENTION OF:

Mr. Seymour Shiner 2244 W. Arthur Chicago, IL 60645

Mr. Louis J. Maiorano, Sr. Mr. Louis J. Maiorano, Jr. c/o Mr. Rodney L. Jacobs 1500 W. Shure Dr. Arlington Heights, IL

Re: Closure of Former Aero Plating Site, 1850 & 1860 N. Elston

Dear Sirs:

This letter is a follow-up to my letter of November 5, 1991 regarding the closure of the subject property. At that time, U.S. EPA was considering its enforcement options to ensure compliance with the requirements of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6901 et seq. and the Illinois laws which implement RCRA. The letter required the addressees of this letter to submit a schedule by which the property at 1850 & 1860 N. Elston would be properly closed.

On November 12, 1991, Mr. Daniel T. Coyne of Aces Maintenance stated in a letter on behalf of Mr. Shiner that "it is Mr. Shiner's intent to complete clean up, remediation and closure documentation by January 31, 1992." Based on that statement, U.S. EPA deferred immediate enforcement actions to allow such closure activities to occur. Mr. Coyne has been in contact with this office to update us on the progress made at the It is apparent that sampling activities have been completed and the extent of contamination has been defined. However, U.S. EPA has not been made aware of any plans by Mr. Shiner or Messrs. Maiorano to actually implement the activities required to complete closure of the facility. The January 31, 1992 deadline was not met. While we appreciate the efforts which have been taken to define the extent of contamination at the facility, only closure itself will establish compliance with relevant laws.

U.S. EPA will pursue its enforcement options to ensure closure of the property unless the addressees of this letter contact U.S. EPA within seven (7) days of receipt of this letter with a clear statement of plans to complete closure of the property. U.S. EPA expects such statement to contain a schedule for closure, and will accept this schedule only if designed to

complete closure activities within the shortest time frame practicable. As you are aware, the State of Illinois EPA is the agency which must confirm that the facility has been properly closed. As such, all correspondence should be copied to the previously identified contact at IEPA.

Please contact me directly with any questions.

Sincerely,

John J. Breslin

Assistant Regional Counsel

cc: Deb Garber

Barbara Russell

Mark Schollenberger, IEPA

Doug Clay, IEPA

Dan Coyne, Aces Maintenance

ACES MAINTENANCE





NOV 15 1991

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V.

November 12, 1991

Mr. John J. Breslin, Assistant Regional Counsel UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Region 5 230 South Dearborn Street Chicago, Illinois 60604

RE: Closure Of Former AERO Plating Site, 1850 & 1860 North Elston, Chicago, Illinois

Dear Mr. Breslin:

Mr. Seymour Shiner has forwarded to our office copies of your September 18, 1991 and November 5, 1991 letters. Mr. Shiner has contracted with ACES Maintenance and Environmental Services Corp. to provide environmental clean up and closure documentation in accordance with the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6901 et seq., and laws of the State of Illinois which implement RCRA. ACES has secured a copy of preliminary sampling and proposed closure documentation from Scientific Laboratories. ACES has determined that additional sampling was necessary to insure that a thorough clean up of the property can be undertaken. Additional sampling was also conducted to determine the extent and possible migration of hazardous material to the soils underneath the concrete slab.

These samples are currently being analyzed and the results should be available the week of November 18 th. These sample results along with the previous Scientific Laboratory samples will indicate the nature and extent of clean up and will lead to suggested clean up and closure alternatives. As indicated in our previous phone conversation, it is Mr. Shiners intent to complete clean up, remediation and closure documentation by January 31, 1992. A formal schedule as requested in your November 5th letter will be available the week of November 25th after Jim McElroy, ACES P.E. and Mr. Shiner have had a chance to review the new sample results and closure alternatives. ACES feels that the January 31, 1992 deadline can be met provided sample results do not indicate grave contamination problems.

Mr. Shiner has indicated that he will seek the help of Mr. Louis J. Maiorano, Sr. and Mr. Louis J. Maiorano, Jr. in this closure process.

If I can be of any further assistance, please contact me at (708) 690-0189.

Sincerely,

Daniel T. Coyne, President

ACES MAINTENANCE

cc: Jim McElroy
Seymour Shiner
Deb Garber
Barbara Russell, 5HR-12
Mark Schollenberger, IEPA
Doug Clay, IEPA
Cliff Gould, IEPA, Maywood

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



REGION 5 230 SOUTH DEARBORN STREET CHICAGO, IL 60604

MOV 0 5 1991

REPLY TO THE ATTENTION OF:

Mr. Seymour Shiner 2244 W. Arthur Chicago, IL 60645

Mr. Louis J. Maiorano, Sr. Mr. Louis J. Maiorano, Jr. c/o Mr. Rodney L. Jacobs, Esq. 1500 W. Shure Dr. Arlington Heights, IL 60004

Re: Closure of former Aero Plating Site, 1850 & 1860 N. Elston

Dear Sirs:

U.S. EPA has previously informed each of you of your legal obligation to accomplish a formal closure of the subject facility, in accordance with the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6901 et seq., and laws of the State of Illinois which implement RCRA. The Maioranos retain such obligation to close the facility pursuant to a Judgment Order, Civ. Action 87 C 4491 (October 28, 1987). Mr. Shiner has such obligation as the current owner of the contaminated property. The Maioranos'contractor, Scientific Laboratories (Ron Bahr, 312-254-2406), sampled the facility several months ago, and found the site to be contaminated. The Maioranos expressed a concern as to their legal ability to obtain access to the facility for purposes of implementing the closure.

By letter of September 13, 1991 (attached), I informed Mr. Shiner of his potential liability under RCRA § 3008 for the closure of the facility. Mr. Shiner's consultant, Environmental Services (Dan Coyne, 708-690-0189), has informed me that it intends to close the facility by some time early in 1992.

By this letter, U.S. EPA requests that the Maioranos and Mr. Shiner submit a schedule to us for the closure of the facility, including a final date for submittal of certification of closure. Submit such schedule within seven calendar days of receipt of this letter. U.S. EPA will accept such schedule, or will modify the schedule and inform the parties as such. The schedule will serve as the legal mechanism by which the parties can close the facility in compliance with all applicable laws and regulations. If such schedule is violated, either by a failure to meet a date or failure to properly accomplish a stated task, U.S. EPA will consider its enforcement options, which include pursuing a

contempt action against the Maioranos in federal district court, and issuing an administrative order to Mr. Shiner under RCRA § 3008. Please submit the schedule to me (5CS-TUB-7) and to the following persons:

Barbara Russell U.S. EPA, 5HR-12 230 S. Dearborn St Chicago, IL 60604 Mark Schollenberger Illinois EPA P.O. Box 19276 Springfield, IL 62794-9276

Contact me with any questions at 312-886-7165.

Sincerely,

-John J. Breslin

Assistant Regional Counsel

cc: Deb Garber

Barbara Russell, 5HR-12 Mark Schollenberger, IEPA

Doug Clay, IEPA

Cliff Gould, IEPA, Maywood



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5 230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

SEP 1 3 1991

REPLY TO ATTENTION OF:

Mr. Seymour Shiner 2244 W. Arthur Chicago, IL 60645

Re: Former Aero Plating Site, 1850 & 1860 N. Elston

Dear Mr. Shiner:

This letter is to notify you of your potential liability under the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6901 et seq. regarding the former Aero Plating Works, Inc. facility located in property which you own at 1850 and 1860 N. Elston in Chicago. A federal court judgment (attached) required Louis J. Maiorano Sr. and Mr. Louis J. Maiorano Jr. (d/b/a/ Aero Plating Works, Inc.) to complete closure of the facility and to submit certification of that closure to the Illinois Environmental Protection Agency (IEPA).

The Maioranos submitted a closure plan to IEPA, which was approved on July 25, 1988, but have not completed the closure required by the court. Recently, the Maioranos' contractor, Scientific Laboratories, Inc., performed preliminary sampling in the 1850 N. Elston and the 1860 N. Elston building. This sampling indicated the presence of hazardous waste contamination in the basements of both buildings. See September 4, 1991 letter from IEPA, attached). The Maioranos have not yet determined how they will remove the contaminated soils. Consequently, the Maioranos have yet to comply with the federal judgment.

Until the facility is properly closed, it remains subject to state and federal hazardous waste laws. As the current owner of the contaminated property, you are potentially subject to federal enforcement under RCRA § 3008(a) to accomplish the closure of the facility. U.S. EPA is currently considering its enforcement options regarding the site. The site poses a potential threat to human health and must be closed in accordance with RCRA and regulations promulgated thereunder.

Please have your attorney contact me regarding this matter. My phone number is (312) 886-7165.

Sincerely,

John J. Breslin Assistant Regional Counsel

cc: Deb Garber
 Barbrara Russell
 Larry Eastep, IEPA
 Mark Schollenberger, IEPA



217/782-6762

Refer to: 0316230001 -- Cook County

Aero Plating ILD005125836

RCRA -- Closure/Log No. C-363-M-1

September 4, 1991

John Breslin, Esquire U.S. EPA 230 South Dearborn Street (5CS-TUB-7) Chicago, Illinois 60604

Gentlemen:

The Illinois Environmental Protection Agency has reviewed the soil results which accompanied Scientific Control Laboratories letter of July 18, 1991. Based on these results, it appears contamination of the soil underlying the RCRA storage area exists. The approved closure plan required a revised closure plan to be submitted within 30 days of the discovery of the contamination. The Agency has not received the required revised closure plan as of the writing of this letter. The Agency will inform you if the revised closure plan is received at a later date. At this time, the Agency has no other comments on the information that you provided us.

Should you have questions or comments regarding the above, please contact Mark A. Schollenberger of my staff.

Very traly yours,

Mawrence W. Eastep, P.E., Manager

Permit Section

Division of Land Pollution Control

LWE:MAS:1at/2575q,18

cc: Maywood Region Division File Rodney L. Jacobs



217/782-6762

Log No. C-363-M-1

Received: June 10, 1988

Refer to: 0316230001 -- Cook County

Aero Plating ILD005125836 RCRA-Closure

July 25, 1988

Louis J. Maiorano, Jr. 422 Mill Valley Palatine. Illinois 60067

Gantlemen:

The closure plan submitted by Ronald Bahr of Scientific Control Laboratories. Inc. has been reviewed by this Agency. Your final closure plan to close the hazardous waste storage areas (container (SOI)) and tank (SO2)) are hereby approved subject to the following conditions.

1. Closure activities must be completed by November 22, 1988. When closure is complete the owner or operator must submit to the Agency certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. This certification must be received at this Agency within 60 days after closure, or by January 21, 1989.

The attached closure certification form must be used. Signatures must meet the requirements of 35 Ill. Adm. Code Section 702.126. The independent engineer should be present at all critical, major points (activities) during the closure. These might include soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for the units approved for closure herein until the Agency approves the facility's closure certification.



The Illinois Professional Engineering Act (Ill. Rev. Stat., Ch. 111, par. 5101 et. seq.) requires that any person who practices professional engineering in the State of Illinois or implies that he (she) is a professional engineer must be registered under the Illinois Professional Engineering Act (par. 5101, Sec. 1). Therefore, any certification or engineering services which are performed for a closure plan in the State of Illinois must be done by an Illinois P.E. The closure plan must include a statement acknowledging this requirement.

Plans and specifications, designs, drawings, reports, and other documents rendered as professional engineering services, and revisions of the above must be sealed and signed by a professional engineer in accordance with par. 5119. sec. 13.1 of the Illinois Professional Engineering Act.

Also along with closure certification, to document the closure activities at your facility, please submit a Closure Documentation Report which includes:

- The volume of waste and waste residue removed. The term waste ā. includes wastes resulting from decontamination activities.
- A description of the method of waste handling and transport. b.
- The waste manifest numbers. C.
- Copies of the waste manifests. d.
- A description of the sampling and analytical methods used. e.
- A chronological summary of closure activities and the cost involved. f.
- Color photo documentation of closure. Document conditions before. g. during and after closure.
- The "Certification Regarding Potential Releases from Solid Waste Management Units" which you submitted is being forwarded to the USEPA for possible future action. The approval of this closure plan neither approves nor disapproves of the aforementioned "Certification".
- If the Agency determines that implementation of this closure plan fails to satisfy the requirements of 35 Ill. Adm. Code, Section 725.211, the Agency reserves the right to amend the closure plan.



- In lieu of the performance standards as outlined in your closure plan, the following performance standards are to be met:
 - The concrete surfaces shall be visually inspected, photographed and a. any residue adhering to the surface must be removed by scraping and/or brushing. Following this, the concrete surfaces must be steam cleaned and triple rinsed. All wash and rinse water shall be collected. If analysis of the wash or rinse water samples detect the presence of hexavalent chromium, nickel or cyanide then that material must be managed as a hazardous waste. If the wash or rinse water samples exhibit a characteristic of hazardous waste then that material must be managed as a hazardous waste. In any event the material must be managed as a special waste. If cracks that penetrate the full depth of the concerete are present, a boring shall be made through the concrete at the crack into the underlying soil to determine if the soil has been contaminated. Soil samples shall be analyzed for the parameters listed below in accordance with "Test Methods For Evaluating Solid Waste, Physical/Chemical Methods" USEPA Publication SW-846 and its updates. Any soil sample which contains the following parameters above their respective criteria is to be considered contaminated and managed as a hazardous waste.

i. Nickel 1.0 mg/l (by EPTox Method) 0.025 mg/l (by Neutral pH Extraction) ii. Cyanide iii. hexavalent chromium 0.05 mg/l (by EPTox Method) 1.0 mg/l (by EPTox Method) iv. Total Chromum

Soil samples are to be taken at depths of 0-6, 6-12 and 12-18 inches. If sampling at the first two profiles indicate no contamination, the analysis at 12-18 inches does not have to be performed. If testing indicates contamination additional sampling shall be conducted to determine the lateral and vertical extent of contamination. At a minimum, one boring shall be taken where the floor has been-grouted in with concrete floor repairing material (at the largest crack in the storage area/process area).

b. The tanks left behind must be subjected to all reasonable means of decontamination before they should be considered "clean". This includes pressure rinses, steam cleaning, manual sludge removal and other means. The independent engineer shall certify the methods used and the amount of residue remaining.



- 5. If contamination is detected, the Agency must be notified in writing within fifteen (15) days. A revised closure plan incorporating exhumation (excavation) or decontamination must be submitted within thirty days of discovery of the contamination.
- The approval of this closure plan does not resolve this facility's violations of 35 Ill. Adm. Code, Part 725, Subpart H (Financia) Requirements). These violations will not be resolved (and the facility will remain out of compliance) until adequate financial assurance is established or the Agency approves the certification of closure.
- 7. Under the provisions of 29 CFR 1910 (51 FR 15,654, December 19, 1986), cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of 40 hours of safety and health training off site plus a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.

Should you have any questions regarding this matter, please contact Mark A. Schollenberger at 217/782-6762.

Very truly yours,

Pérmit Section

Division of Land Pollution Control

LWE:MAS:dks/2127j, 44-47

Attachment

cc: Northern Region -- Clifford Gould Division File - Closure USEPA Region V -- Jim Mayka USEPA Region V -- Mary Murphy Compliance Section



ATTACHMENT

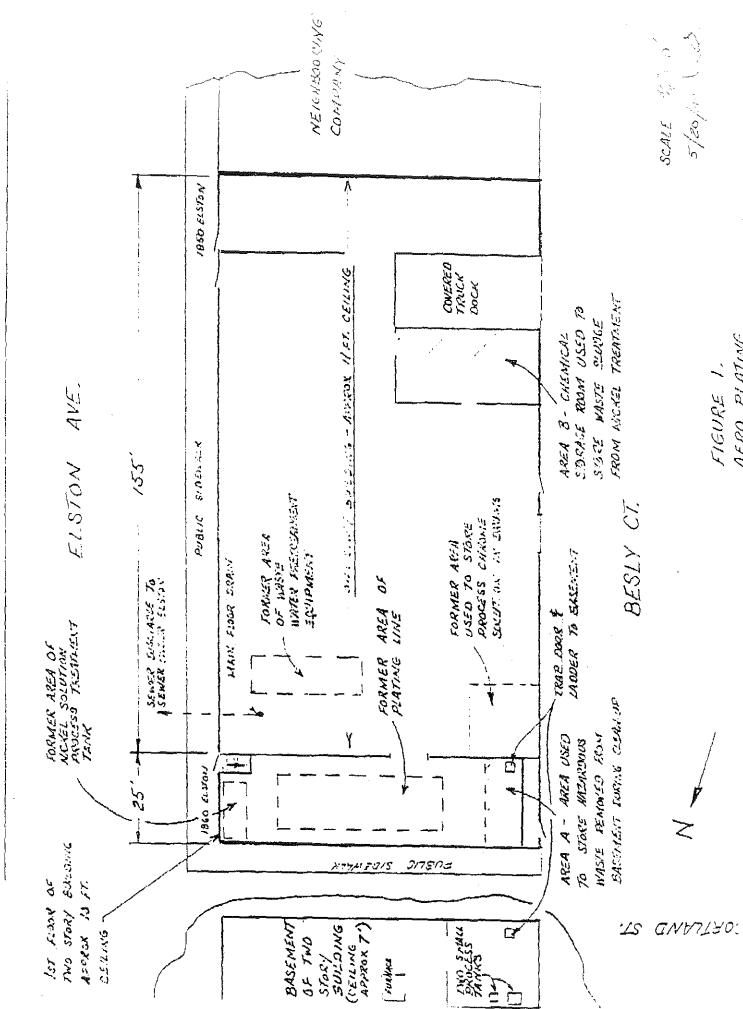
This statement is to be completed by both the responsible officer and by the registered professional engineer upon completion of closure. Submit one copy of the certification with original signatures and three additional copies.

Closure Certification Statement

Closure Log C-

The hazardous waste management units at the facility described in this document have been closed in accordance with the specifications in the approved closure plan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

USEPA ID Number	Facility Name				
Signature of Owner/Operator	Name and Title				
Signature of Registered P.E.	Name of Registered P.E. and Illinois Registration Number				
Date					
MAS:dks/2127j, 48					



AERO PLATINE



TESTING . RESEARCH . CONSULTING

May 6, 1988

Mr. Louis J. Maiorano, Jr. 422 Mill Valley Palatine, IL 60067

Subject: Closure Plan for Aero Plating Works, Inc.

FOREWORD:

This closure plan is being adopted in order to meet the requirements of United States Environmental Protection Agency and Illinois Environmental Protection Agency regulations regarding the closure of a hazardous waste storage facility. A closure plan had previously been submitted to the IEPA, but certain deficiencies had been specified by the IEPA which prevented the agency from accepting the plan. We are attempting to address all of the items specified by the IEPA in their response letter of Dec. 10, 1987.

I. DESCRIPTION OF FACILITY:

Aero Flating Works, Inc. operated a job shop electroplating facility under SIC code 3471 in an establishment encompassing two connected buildings. The street address of the establishment was:

1850-1860 North Elston Ave. Chicago, IL 60622

At the time of interest nickel and chromium plating were the specific types of electroplating being carried out at Aero Plating. The plating operation was a hazardous waste generator under USEPA identification number ILD005125836. A plan of the facility is attached as Figure 1. A copy of the appropriate portion of the 7.5 minute U.S. Geological Survey quadrangle map is attached as Figure 2. The drawings of the facility address the situation which existed in early 1984 at the time of the IEPA inspection. The facility had operated at these buildings over a forty year period. At no time did the company intend to become a

hazardous waste storage facility. In error the facility had violated the requirement that a hazardous waste generator limit the storage of waste generated on site to a period of less than 90 days.

This closure plan specifically addresses all those areas of the facility which contained the hazardous waste for more than 90 days. Other areas of the facility which were only part of the electroplating operation and therefore not involved in any storage operations are shown in the drawings and are addressed in this plan, but are not considered to be of primary concern for testing since these areas were not exposed to storage facility hazardous waste. Areas have been addressed by the IEPA which were not part of the storage facility. We will attempt to meet any such requests for confirmation of the clean condition of specific areas in order to responsibly expedite the closure of the entire facility in such a manner so as to protect the environment and the public health.

The company is no longer in business. The closure of the storage facility will be a complete and final closure of the facility. The facility is no longer a generator of hazardous waste.

The smaller, two story building currently is the site of offices on the second floor and a cabaret, art gallery, theater on the first floor. The basement is not in use. The larger single story building is being used by a furniture firm at the northern end for rattan furniture manufacturing and a furniture showroom. Most of the single story building is not currently in use. All of these operations are independent and unconnected with Aero Plating. They are renting the buildings from the owner of the buildings. Both buildings are of brick masonry construction. The floor in the single story building is of concrete construction. A normal amount of cracks have occurred in the floor of the building (one or two cracks per 1000 square feet seems normal for a building this age) and have been filled with a cement grout type of crack filling material. The first floor of the two story building has a floor of a combination concrete and chemical resistant brick construction in most of the area and a concrete construction near the west end. The floor is in good condition and has been painted. The basement floor is of concrete construction.

The main floor drain for process liquids from both building was near the southeast corner of the one story building. The effluent was directed to the publicly owned sanitary sewer in Elston Avenue after pretreatment.



In the process of ceasing operations as an electroplating business all process chemicals were drained from the tanks, drummed, and sold for use as electroplating chemicals. All process equipment was triple rinsed and the acid bearing tanks neutralized with a caustic rinse. One cyanide bearing tank was triple rinsed and treated with sodium hypochlorite to oxidize any residue. Since ceasing operation as a business was part of normal business procedures and not closure of a hazardous waste storage facility the cleaning and disposal of these pieces of equipment and the processing chemicals are not considered in this closure plan as being part of the hazardous waste storage facility closure. Releases of rinse waters from an electroplating operation which are within the limits of the local control authority for the publicly owned treatment works are not normally considered to be releases of hazardous waste. Decontamination of equipment and areas related to a business operation generating hazardous waste are not normally subject to the same requirements as the closure of a hazardous waste storage facility. Good business practice involves good housekeeping procedures in cleaning up a building when a company ceases operation at the site. Such housekeeping procedures were carried out in ceasing the electroplating operation at Aero Plating. General cleaning and painting was done to provide a desirable building for the next tenant. This general cleaning of areas not used for hazardous waste storage is not considered to be part of the hazardous waste storage facility closure plan.

Closure Certifications:

Aero Plating made a conscientious effort to quickly clean-up the facility after the IEPA inspections. Through lack of knowledge an independent registered professional engineer was not retained at that time to supervise the clean-up operations. Since these actions have been completed the normal reference made to the direction of an independent registered professional engineer during the clean-up operations cannot be made. The responsible party from Aero Plating, Mr. Louis J. Maiorano, Jr., has at this time retained an independent testing laboratory and an independent registered professional engineer to direct the completion of the closure. We would hope that any recommendations or directions from the Illinois Environmental Protection Agency concerning this closure plan can take this condition into account in order to allow the completion of the closure activity in such a manner so as to protect the environment, and the public health, and conserve the resources of the agency. Testing of the appropriate areas which were used for hazardous waste storage and testing of areas which were not storage areas , but which the agency has chosen to specify will be carried out under the



direction of an independent registered professional engineer in accordance with this closure plan.

Verification of Decontamination:

In order to verify that the decontamination processes already completed at the facility have resulted in satisfactory decontamination the tests listed in this section will be made by the independent registered professional engineer and an independent testing laboratory to verify the level of chemical constituents of interest which are now present in the buildings.

The area of the first floor of the two story building in which waste was stored will be checked using wipe tests of the area to check for the levels of the following contaminants: chromium, nickel, and cyanide. This is the area in which waste generated during the cleaning of the basement was stored. The area is labeled as the Storage Area A on the attached facility diagram. The floor in this area is of concrete construction.

The chemical storage room in the southwest corner of the one story building was used as a waste storage area for sludge generated during nickel treatment. The floor of the room will be wipe tested to check for the following contaminants: nickel, chromium, cyanide. The floor is of concrete construction. A few cracks in the floor have been grouted in with concrete floor repairing material. This area is labeled as Storage Area B in the facility diagram.

The northwest corner of the one story building was used for storing process chrome plating solution in drums to be reused in the process or sold when the plating operation was discontinued. The material was not hazardous waste since it was meant to be recycled internally within the facility. The area was not a hazardous waste storage area. The area is identified as Chrome Solution Holding Area on the facility diagram. In order to expedite the closure wipe tests will be carried out on this non-storage area to check for chromium, nickel, and cyanide.

The basement of the two story building was used as a stripping area for parts. Two small tanks were built on site in the



basement (about one hundred gallon capacity each). The tanks are of steel construction. The tanks are currently empty and were cleaned along with thew other process equipment by here Platting personnel. The tanks cannot easily be removed from the basement. The tanks will both be checked using wipe tests to sheck the inside and outside of each tank for the levels of the following contaminants: chromium, nickel, cyanide.

The basement itself was not used for hazardous material storage. Any contamination in the basement would nave been the result of production related contamination, not the storage of hazardous waste products. Floor spillage was transferred to the waste treatment system in the one story building for pretreatment. The agency has expressed concern that the production area of the basement has not been adequately cleaned of production related contamination. The ceiling of the basement and the floor and walls of the basement will be wipe tested to determine the levels of contamination for the following: chromium, nickel, and cyanide. The basement is not currently in use for any purpose.

A process tank was used at the east end of the first floor of the one story building to treat process nickel solution. The tank was not used for hazardous waste storage. The tank has been removed along with the rest of the process equipment which was cleaned and sold. The floor area under the tank will be checked using wipe tests to check for levels of chromium, nickel, and cyanide. The area is shown on the diagram as Nickel Process Tank Area.

The floor area which was under the waste water pretreatment system will be wipe tested to check for levels of chromium, nickel, and cyanide. This area of the one story building is designated on the diagram. This area was not a hazardous waste storage area, but rather a processing area for the hazardous waste generator.

The floor area which was under the plating line will also be wipe tested to check for levels of chromium, nickel, and cyanide. This area of the two story building is shown on the facility diagram. The area was not a hazardous waste storage area.

If in the opinion of the independent registered professional engineer any of the areas need further cleaning to protect the public health or the environment the cleaning will be specified by the engineer and carried out by Aero Plating personnel or by an outside contractor knowledgeable in such cleaning procedures. Any waste generated by additional cleaning will be treated as hazardous waste and properly disposed of through licensed disposal or treatment facilities. All tools or equipment used in such a cleaning will be properly cleaned. Clean up personnel, if needed, will utilize proper protective clothing, such as face shields, rubber gloves, rubber boots, chemically resistant splash suits and hats. Such equipment will be specified by the engineer based on the clean up being carried out. Typical cleaning



procedures would involve the use of manual scrub brushes, detergent, bleach, acid, and solvent solutions, manual scrapping tools, five gallon plastic buckets, and 55 gallon drums suitable for the cleaners and waste being removed. Because there are current tenants in the building the amount of overspray and general disruption should be kept to a minimum when choosing cleaning methods.

Wastes Shipped Off-site:

All waste involved in the closure of the hazardous waste storage facility along with waste generated in ceasing operations as an electroplater was sent to Chemical Waste Management facilities. The uniform waste manifest copies are not in the possession of Aero Plating at this time. Some correspondence and Metropolitan Sanitary District of Greater Chicago manifests are in the records of Aero Plating. We are currently requesting any copies of the manifest forms from the Chemical Waste Management facilities involved in order to complete our records.

At this time it appears that nine drums of nickel sludge from the hazardous waste storage facility area "B" were shipped to Chemical Waste Management's Emelle, Alabama site (ALD0006222464) on June 4, 1984.

At this time it also appears that a combination of wastes totaling 49 fifty-five gallon drums from both the hazardous waste storage facility and from the hazardous waste generation related to the business were shipped to the same facility on September 28, 1984. We feel that nine of the 49 drums were waste from the storage facility. In our opinion the waste was the material cleaned up from the basement of the two story building which had been stored in the nine drums in area"A" of the hazardous waste storage facility.



Expected Closure Date:

Aero Plating expects its hazardous waste drum storage areas to be certified as being closed during 1988. In order to affect this, the following closure schedule is being adopted.

Dates are based on the date of final approval of the closure plan by the IEPA as being Day"0"

> By Day "30" Complete initial wipe tests of specified areas.

By Day "60" Complete any further decontamination of the facility if such cleaning was specified by the engineer. Have independent laboratory retest to verify decontamination of areas involved.

By Day "75" complete testing of areas to verify decontamination.

By Day "95" complete testing of any wastes generated during further cleaning activities.

By Day "115" send any additional wastes to proper disposal or treatment site.

By Day "145" obtain all completed manifests from ultimate treatment or disposal site for any additional waste generated from the clean up activities.

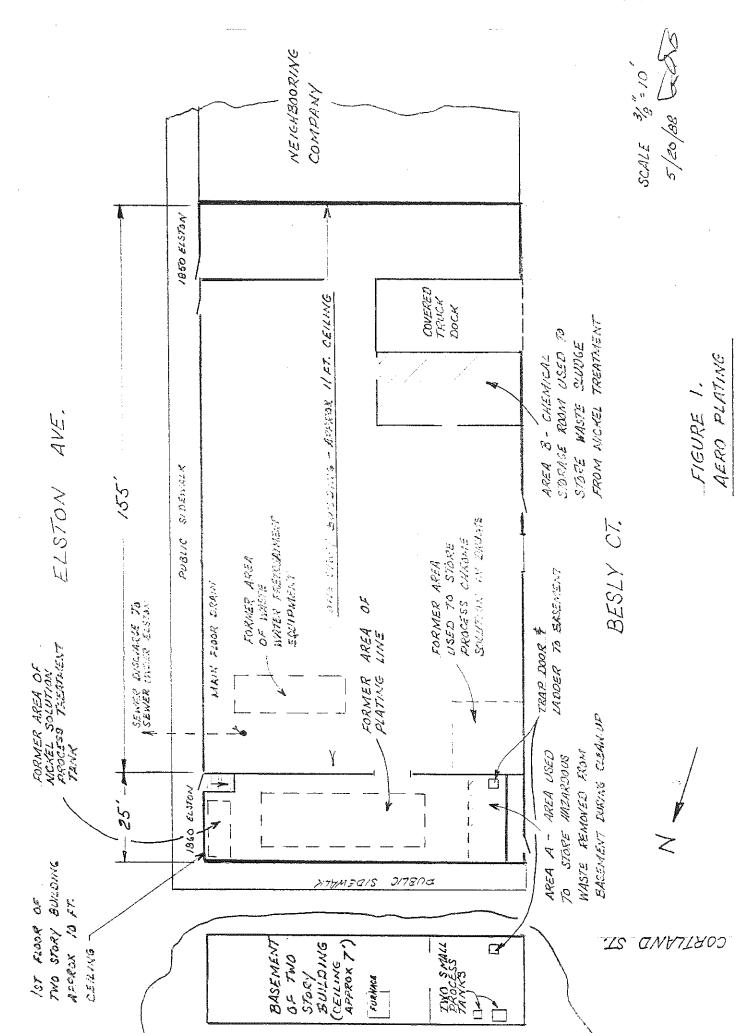
By Day "120" have independent professional registered engineer certify closure of the facility in accordance with the provisions of this plan

By Day"130" submit by certified mail, certification of closure by Aero Plating and the independent registered professional engineer to the proper environmental authorities.

Respectfully submitted,

SCIENTIFIC CONTROL LABORATORIES, INC.









Scientific CONTROL LABORATORIES, INC.

TESTING . RESEARCH . CONSULTING

June 6,1988

Mr. Lawrence W. Eastep Manager, Permit Section Illinois Environmental Protection Agency Division of Land Pollution Control 2200 Churchill Road Springfield, IL 62706

Re: 0316230001 - Cook County

Aero Plating ILD005125836 RCRA - Closure



Dear Sir:

In response to the letter from the Illinois Environmental Protection Agency dated Dec. 10,1987 regarding certain deficiencies in the closure plan submitted for Aero Plating Works, Inc., Scientific Control Laboratories, Inc. was retained by Mr. Louis J. Maiorano, Jr. to participate in the closure of the facility. Attached please find a closure plan for the facility.

An addendum to the plan may be submitted when further information relating to the shipments of waste is obtained as referred to in the plan.

Please contact us if you have any questions.

Sincerely,

Ronald A. Bahr

CC:

IEPA, Northern Region Div. of Land Pollution Control 1701 S. 1st Ave. Maywood, IL 60153

USEPA Region V
Waste Management Division
Hazardous Waste Enforcement Section
230 S. Dearborn St.
Chicago, IL 60604

Mr. Louis J. Maiorano, Jr. 422 Mill Valley Palatine, IL 60067



NOV 2: 1997

Charles Real Illinois SPA P.O. Nox 19276 2200 Churchill Road Springfield, Illinois 62794-9276

Re: Aero Plating Works, Inc. Louis Maiorano

Dear Mr. Zeal:

Enclosed is a copy of a judgment with reference to the above captioned. A closure plan involving the same facility was recently submitted to IEPA, and has been assigned to Wally El-Beck for review, I believe.

You will note that provision 7d. of the Judgment requires the defendants to take some immediate actions, at the direction of your agency. The need for immediate relief resulted from our discovery that this facility had been refurbished and was about to open as a coffeehouse/bookstore.

It may be that you will be contacted by the defendants or by their attorney, Bertram Stone. Would you please bring the situation to the attention of the appropriate persons in your agency who may be called upon to provide direction regarding immediate measures to protect the public. By copy of this letter, I am advising Mr. Sould, in the event his office is contacted.

If you have any questions, please do not besitate to contact me at (312) 353-6126.

Sincerely,

Charles McKinley Assistant Regional Counsel

Enclosure

cc: Charles Gould (w/judgment)
William Muno (w/judgment)
Jim Mayka (w/judgment)
Ron Brown (w/judgment)

de

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,

Plaintiff,

Civil Action No. 87 C 4491

Judge Rovner

LOUIS J. MAIORANO, Sr. and LOUIS J. MAIORANO, Jr. d/b/a Aero Plating Works, Inc.,

Defendants.

JUDGMENT ORDER

This matter came on for hearing on October 28, 1987 before the Court, Honorable Ilana Diamond Rovner, District Judge presiding, the plaintiff United States having moved for entry of a partial judgment on the pleadings, and the Court having considered plaintiff's motion set forth hereafter, it is hereby:

ORDERED AND ADJUDGED

- 1. Defendants having ceased all treatment, storage, or disposal of hazardous waste at the premises formerly occupied by Aero Plating Works, Inc. (the facility), are hereby enjoined from undertaking such activities unless they comply with applicable law, including obtaining all necessary permits and approvals required by U.S. EPA and the State of Illinois EPA.
- 2. Defendants shall properly dispose of any and all hazardous waste which is present at the facility, by commencing the following activities, all of which shall be completed within

ten (10) days from the entry of this Judgment:

- a. Prepare manifests prior to the off-site transporation of any hazardous waste as required by 35 Ill.

 Adm. Code § 722.120(a).
- b. Package such hazardous waste according to applicable Department of Transportation regulations (49 C.F.R. Parts 173, 178 and 179) prior to transportation off-site as required by 35 Ill. Adm. Code § 722.130.
 - c. Label each drum of hazardous waste in accordance with applicable Department of Transportation regulations (40 C.F.R. Part 172) prior to transportation off-site as required by 35 Ill. Adm. Code § 722.131.
 - d. Prior to shipping such hazardous waste off-site, mark each container of 110-gallon capacity or less with the following words as required by 35 Ill. Adm. Code § 722.132(b):

"HAZARDOUS WASTE----Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.

Generator	:'s	Name	and	Address	,
Manifest	Dog	ument	: Nur	nber	•

- e. Offer the transportation placards according to Department of Transportation regulations (49 C.F.R. Part 172, Subpart F) as required by 35 Ill. Adm. Code § 722.133.
- 3. a. Defendants have submitted to the Illinois EPA and to the U.S. EPA a closure plan for the facility; that shall be amended to meet the standards for such plans contained

in 35 <u>III</u>. <u>Adm</u>. <u>Code</u>. § 725.210, as determined by the Illinois EPA, and which shall detail the activities to be accomplished and that have already been accomplished by the Defendants to remove and properly dispose of or otherwise handle the hazardous waste at the facility. If said plan is determined by the Illinois EPA to be inadequate, Defendants shall make any revisions required by the Illinois EPA and submit a revised closure plan within ten (10) days from the date that they are notified by Illinois EPA that the plan is inadequate and that copies thereof to be forthwith submitted to counsels for plaintiff.

- b. Within 30 days of Illinois EPA approval of the closure plan, Defendants shall complete closure of the facility, in accordance with the approved closure plan and upon completion shall submit a certification of closure to the Illinios EPA, as required by 35 Ill. Adm. Code § 725.215.
- 4. Within 10 days of the entry of this Judgment Defendants shall provide the information requested by the U.S. EPA in its Information Request dated February 3, 1987, issued to the Defendants pursuant to § 3007 of the Resource Conservation and Recovery Act 42 U.S.C. 6927.
- 5. Judgment is hereby entered against the Defendants, jointly and severally, in the amount of eighteen thousand five hundred dollars (\$18,500), together with interest at the prevailing rate(s) as provided at 31 U.S.C. § 3717, commencing on April 28, 1986;

- 6. In addition, judgment is hereby entered against Defendant Louis J. Maiorano, Jr. in an additional amount of three thousand five hundred dollars (\$3,500) together with interest at the prevailing rate(s) as provided by 31 U.S.C. § 2717, commencing on April 28, 1986;
- 7. Defendants shall immediately undertake the following activities to protect human health:
- a. Not later that October 28, 1987 they shall orally inform the present owner, tenant(s), occupant(s), contractor(s), and any other person on the premises which are the subject of this action that the facility which was formerly located at said premises utilized hazardous materials and that it has not been shown that said facility was properly closed and that all hazardous wastes have been fully removed and properly disposed.
- b. Not later than October 29, 1987, they shall provide written notice of the above information to the persons specified above by certified mail, return receipt requested, or by personal delivery, and shall furnish a copy of said written notice to plaintiff's counsel.
- c. Not later than October 29, 1987, they shall attempt to post a written notice of the same information at all entrances to the premises, and at other conspicious places, in a manner and format likely to alert persons coming on to the premises.

- Defendants shall immediately contact the Illinois EPA to request its direction concerning a protocol for sampling and analysis to determine whether hazardous wastes remain on the subject premises and shall follow its direction. In addition,, they shall perform any remedial activities determined to be necessary by the Illinois EPA. Defendants shall provide a written report to Plaintiff's counsel of all activities undertaken pursuant to the said directions and determination of Illinois EPA.
- The Court reserves the issue of the amount of any civil penalty to be imposed for defendants' failures to comply with the order of the Administrative Law Judge, any failure to comply with the terms of this Judgment and Order, any additional remedial actions which may be necessary to protect public health.

Mure proture pudge, United States



CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Re: Closure Plan Review

Facility Name: AERO PLATING

USEPA ID #:

005125836

AERO PLATING DORKS 1860 ELSTON AVENUE CHICAGO, IL. 60622

Dear SIR,

As you are aware, we are currently evaluating the request for closure of your facility as referenced above, and which is regulated under the Resource Conservation and Recovery Act (RCRA).

On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (the Amendments) were enacted to amend RCRA. Under Section 206 and Section 233 (copies enclosed) of the Amendments, all facilities "seeking a permit" (taken to mean interim status facilities) must provide for corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the Unit. Please note that both hazardous and non-hazardous wastes can meet the definition of solid waste under 40 CFR 261.2.

Consequently, we must determine whether such releases have ever occurred at the facility site. If they have, we must ensure that any necessary corrective actions either have been taken, or will be taken, pursuant to a decision on your closure plan. An important part of our determination includes your willingness (or unwillingness) to complete the enclosed certification form. Please read it carefully, complete it, and either sign and return it, or return it to us unsigned with a cover letter of explanation, within 30 days of the date of this letter. Public notice of your request for closure approval, and this request, will be in a newspaper of general circulation in the area of the facility.

Please call PERMIT SECTION at 217/782-6762 if you have any questions, or wish to discuss this matter further.

Very truly yours,

Kawrence W. Eastep, P.E., Manager

Permit Section

Division of Land Pollution Control

LWE:CA:tk:5/2/9

Enclosures

cc: David A. Stringham, USEPA - Region V

Permit Section Division File JAPORATORY 3158 S. KOLIN AVENUE CHICAGO, IL \$0623*4889 [332] 25442408 FAX (312) 254-6661



\$40 YEER NO 225 M FOR SUL 17, 32 0 CHESAPEAKE SQUARE ADDISON, IL 50101-5504 1708, 702 FAX: (705) 829-7055

July 18,1991

Mr. Rodney L. Jacobs Attorney At Law 1500 W. Shure Drive Arlington Heights, IL 60004

Dear Mr. Jacobs:

Attached please find copies of the original closure plan and the IEPA modified acceptance letter. Looking at Figure 1 should help in understanding the testing points described below.

In the two story building the following surfaces were tested by scrubbing sample areas of approximately 10 inch diameter and analyzing the scrub water which was vacuumed up and composited in the vacuum for the area:

Basement floor in the vicinity of the former two small process tanks (three sample areas scrubbed)

First floor in Area A used to store hazardous waste removed from the basement during clean-up (two sample areas scrubbed)

The areas of the former plating line and the nickel solution process treatment tank are currently covered with a finished hardwood floor and were <u>not</u> tested. No significant cracks were present in the two story building basement floor which required soil sampling tests.

In the one story building the following surfaces were tested by scrubbing three sample areas of approximately 10 inch diameter and analyzing the scrub water which was vacuumed up and composited in the vacuum for the area:

Area which was used to store process chrome solution

Area which was used for waste water treatment equipment

Area B used to store waste sludge from nickel treatment

Samples of the waters used for testing were analyzed to determine any pollutants present in the fresh water.

Page 2

In the one story building significant cracks were present in the area of the waste water treatment equipment and Area B. The concrete floor was broken through and samples taken using an auger and hand tools. The following samples were taken:

Waste water treatment area - samples at 0-6", 6-12", and 12-18" below the bottom of the concrete. The material appeared to be fill containing cinders and bricks used in the construction of the building, not soil.

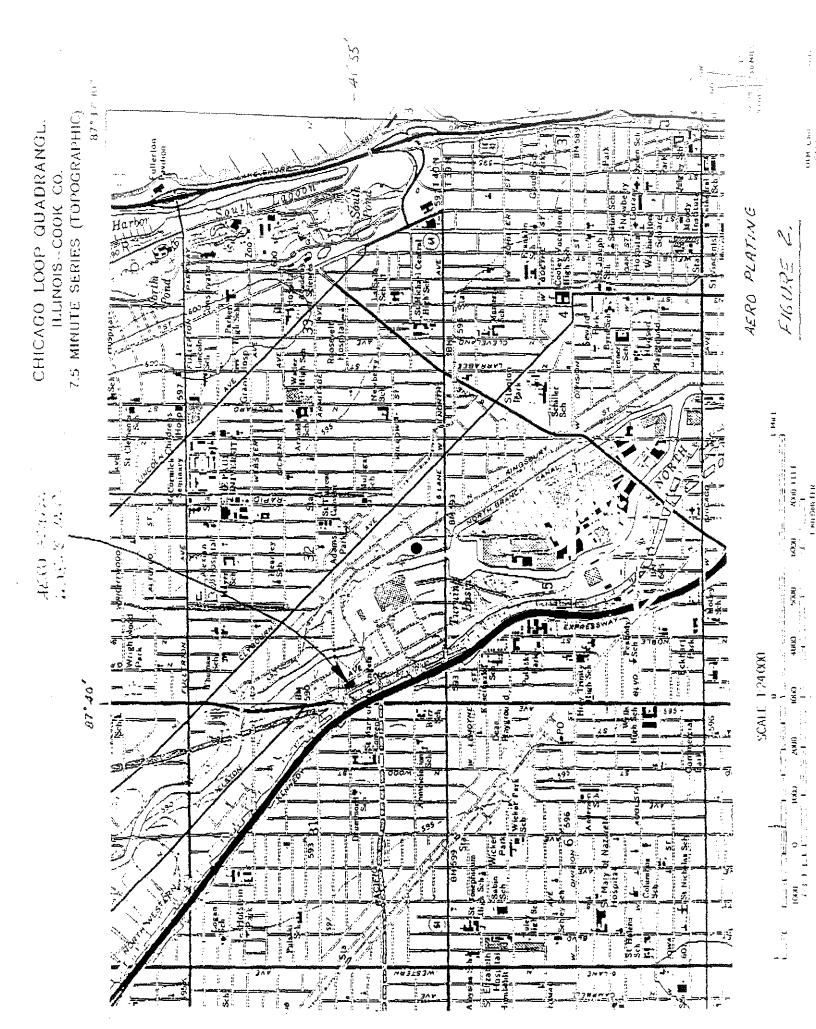
Area B - samples taken at 0-6", and 6-12" below the bottom of the concrete. The material was of a different consistency than the cinder fill seen at the other boring location but we would still suspect that the material was fill and not soil. No sample was taken at 12-18" because of an obstruction under the floor. The obstruction may have been a larger item used as fill under the building. We chose to not force a break through the item since we had not done any preliminary checks concerning underground utilities or lines and we already had the two higher level samples.

I hope this description helps you understand the laboratory report.

Respectfully yours,

anald Q. B.h.

Ronald A. Bahr



. 35 3. - 3. - 3.4 - 4.4 - 4.5



0.483486446.30.447 407.604.04 (708) 529-7050 FAX (708) 629-7055

REPORT TO:

Rodney L. Jacobs

Attorney at Law 1500 Shure Drive

Arlington Hts IL 60004

ATTENTION:

LAB NO:

54-999

RECEIVED:

7-09-91

TEST TYPE:

Water Analysis

REPORTED:

7-22-91

IDENTIFICATION OF MATERIAL:

Eight (8) water samples, identified as: RE: LOU MAIORANO PROJECT

PROCEDURE:

All analyses were performed in accordance with the EPA/IEPA approved test procedures as specified in 40CFR, part 136.

Scientific Control Labs, Inc., is an IEPA certified laboratory for analysis of potable water (#100183). This means we have a quality control program in effect and that this quality control program is monitored and reviewed annually by the Illinois Environmental Protection Agency.

RESULTS:

(Please see page two for results)

Lab No: 54-999 July 22, 1991

RESULTS:

1025

Concentration in ppm (mq/L)

Sample ID:	Total <u>Cyanide</u>	Hexavalent Chromium	<u>Nickel</u>
Rinsewater Comp. 3 Spots in Basement Area	0.70	<0.01	48.8
Rinsewater Comp. 2 Spots in Area of Former WW Pretrtmt Equip	2.80	3.83	31.2
Rinsewater Comp. 3 Spots in Former Area used to Store Process CR Sol'n	2.55	<0.01	39.1
Rinsewater Comp. 2 Spots in Area A	0.25	<0.01	22.8
Control Sample Fresh H20 used to rinse WW Trt & CR Sol'n Storage Areas	<0.01	<0.01	<0.05
Control Sample Fresh H20 used to rinse Area A & Basement	<0.01	<0.01	<0.05
Control Area B	<0.01	<0.01	<0.05
RW Comp. 3 Spots in Area B	0.30	2.20	2.9

Respectfully submitted,

SCIENTIFIC CONTROL LABORATORIES, INC.

Ву____

Colette Pohan

CR:clm

CERTIFICATION:

The above statements and report were subscribed and sworn to before me this TWENTY-SECOND day of JULY, 1991.

"OFFICIAL SEAL"

CAROL L. MACISJEWSKI

Notary Public. State of Hilmels

My Cemmissien Expires 2/24/94

Jotannie Dublie

.57 374 (708) 629-7050 -54x (708) 629-1055

CONTROL LABORATORIES, INC.

TESTING - CONSULTING

REPORT TO:

Rodney L. Jacobs

Attorney at Law 1500 Shure Drive

Arlington Hts IL 60004

ATTENTION:

LAB NO:

54-998

TEST TYPE:

Soil Analysis

RECEIVED:

7-09-91

REPORTED:

7-22-91

IDENTIFICATION OF MATERIAL:

One (1) soil sample, identified as: LOU MAIORANO PROJECT

. 0-6" Crack in WW Trt Area 7-8-91

PURPOSE:

The purpose of the testing is to determine if the submitted sample is hazardous as per 40 CFR, Part 261, Subpart C.

I. E P TOXICITY:

PROCEDURE:

The sample was leached and analyzed in accordance with the procedure specified in 40 CFR, Part 261, Appendix II.

RESULTS:

Parameter:	EPA Hazardous Waste Number	If Analysis is above or equal to this value, the waste is deemed hazardous	Analysis (mq/L)
Chromium	D007	5.0	<0.1
Hexavalent Chromium	D007	5.0	<0.025
Nickel		20.0	1.27

II. TOTAL CYANIDE

PROCEDURE:

The sample was analyzed in accordance with "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods SW-846 USEPA," Method 9010.

RESULTS:

Concentration in ppm

Total Cyanide

0.55

SCIENTIFIC CONTROL LABORATORIES, INC.

By Colit

Respectfully submitted,

CR:clm

Sample returned via U.P.S.



NTROL LABORATORIES, INC.
TESTING - CONSULTING

REPORT TO:

Rodney L. Jacobs

Attorney at Law 1500 Shure Drive

Arlington Hts IL 60004

ATTENTION:

LAB NO:

54-998

TEST TYPE: Soil Analysis

RECEIVED:

7-09-91

REPORTED:

7-22-91

IDENTIFICATION OF MATERIAL:

One (1) soil sample, identified as: LOU MAIORANO PROJECT
. 6-12" Crack in WW Trt Area 7-8-91

PURPOSE:

The purpose of the testing is to determine if the submitted sample is hazardous as per 40 CFR, Part 261, Subpart C.

I. E P TOXICITY:

PROCEDURE:

The sample was leached and analyzed in accordance with the procedure specified in 40 CFR, Part 261, Appendix II.

RESULTS:

Parameter:	EPA Hazardous Waste Number	If Analysis is above or equal to this value, the waste is deemed hazardous	Analysis (mq/L)
Chromium	D007	5.0	0.20
Hexavalent Chromium	D007	5.0	<0.025
Nickel	(III) 400 400 -W	20.0	3.07

II. TOTAL CYANIDE

PROCEDURE:

The sample was analyzed in accordance with "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods SW-846 USEPA," Method 9010.

RESULTS:
Total Cyanide

Concentration in ppm

0.30

Respectfully submitted,

SCIENTIFIC CONTROL LABORATORIES, INC.

By Colette John

CR:clm

Sample returned via U.P.S.

IF-CAGO: 2 6062314889 314, 254-2406 FAX (312) 254-6661



VDE 50% _ 4 .708/ 629-7050 FAX (708) 629-7055

REPORT TO:

Rodney L. Jacobs

Attorney at Law 1500 Shure Drive

Arlington Hts IL 60004

ATTENTION:

LAB NO:

54-998

TEST TYPE:

Soil Analysis

RECEIVED: REPORTED:

7-09-91

7-22-91

IDENTIFICATION OF MATERIAL:

One (1) soil sample, identified as: LOU MAICRANO PROJECT . 12-18" Crack in WW Trt Area 7-8-91

PURPOSE:

The purpose of the testing is to determine if the submitted sample is hazardous as per 40 CFR, Part 261, Subpart C.

I. E P TOXICITY:

PROCEDURE:

The sample was leached and analyzed in accordance with the procedure specified in 40 CFR, Part 261, Appendix II.

RESULTS:

Parameter:	EPA Hazardous Waste Number	If Analysis is above or equal to this value, the waste is deemed hazardous	Analysis (mg/L)
Chromium	D007	5.0	0.39
Hexavalent Chromium	D007	5.0	<0.025
Nickel		20.0	2.03

II. TOTAL CYANIDE

PROCEDURE:

The sample was analyzed in accordance with "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods SW-846 USEPA," Method 9010.

RESULTS:

Concentration in ppm

0.05

Total Cyanide

Respectfully submitted,

SCIENTIFIC CONTROL LABORATORIES, INC.

Colette Rohe

CR:clm

Sample returned via U.P.S.

312, 154+3406 FAX (312) 254-6661



400 50N (1 8 (1 8))

FAX (708) 629-7055

REPORT TO:

Rodney L. Jacobs

Attorney at Law 1500 Shure Drive

Soil Analysis

Arlington Hts IL 60004

ATTENTION:

TEST TYPE:

LAB NO:

54-998

RECEIVED:

7-09-91

REPORTED:

7-22-91

IDENTIFICATION OF MATERIAL:

One (1) soil sample, identified as: LOU MAIORANO PROJECT . Area B 0"-6" 7-10-91

PURPOSE:

The purpose of the testing is to determine if the submitted sample is hazardous as per 40 CFR, Part 261, Subpart C.

I. E P TOXICITY:

PROCEDURE:

The sample was leached and analyzed in accordance with the procedure specified in 40 CFR, Part 261, Appendix II.

RESULTS:

Parameter:	EPA Hazardous Waste Number	If Analysis is above or equal to this value, the waste is deemed hazardous	Analysis _(mq/L)
Chromium	D007	5.0	<0.1
Hexavalent Chromium	D007	5.0	<0.025
Nickel		20.0	65.8

II. TOTAL CYANIDE

PROCEDURE:

The sample was analyzed in accordance with "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods SW-846 USEPA," Method 9010.

RESULTS: Total Cyanide Concentration in ppm

1.45

Respectfully submitted,

SCIENTIFIC CONTROL LABORATORIES, INC.

By_

Celitte Rah

CR:clm

Sample returned via U.P.S.

Colette Rohan

REPORT TO:

Rodney L. Jacobs

Attorney at Law 1500 Shure Drive

Arlington Hts IL 60004

ATTENTION:

LAB NO:

54-998

RECEIVED:

REPORTED:

7-09-91 7-22-91

ADD SON LUNC THAT

FAX (708) 829-7055

TEST TYPE:

Soil Analysis

IDENTIFICATION OF MATERIAL:

One (1) soil sample, identified as: LOU MAIORANO PROJECT
. Area B 6"-12" 7-10-91

PURPOSE:

The purpose of the testing is to determine if the submitted sample is hazardous as per 40 CFR, Part 261, Subpart C.

I. E P TOXICITY:

PROCEDURE:

The sample was leached and analyzed in accordance with the procedure specified in 40 CFR, Part 261, Appendix II.

RESULTS:

Parameter:	EPA Hazardous Waste Number	If Analysis is above or equal to this value, the waste is deemed hazardous	Analysis
Chromium	D007	5.0	<0.1
Hexavalent Chromium	D007	5.0	<0.025
Nickel	40 40 40 W	20.0	32.4

II. TOTAL CYANIDE

PROCEDURE:

The sample was analyzed in accordance with "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods SW-846 USEPA," Method 9010.

RESULTS:
Total Cyanide

Concentration in ppm

1.00

Respectfully submitted,

SCIENTIFIC CONTROL LABORATORIES, INC.

By Colitte John

CR:clm

Sample returned via U.P.S.

Calatta Dahan

(312) 254-2406 FAX (312) 254-2661

RODJAC
RODNEY L. JACOBS
ATTORNEY AT LAW
1500 SHURE DRIVE
ARLINGTON HTS., IL 60004

BOICANI

111 1 W W 1 W W

OATE NUMBER PAGE DUE DATE

07/29/91 37479 1 08/28/91

FOR YOUR # OUR #

0,0, N30 OUR#

ORDERED FIVE SOIL SAMPLES RECEIVED 7-09 & 7-10 RE: LOU MAIORANO FOR ANALYSIS attick oreston A TORR A SETUP CHGE EP TOX. 5.000 5.000 75.0000 375.00 Item # EPTOX-SET INDIV. METAL EP TOX 15.000 15.000 25.0000 375.00 Item # EPTOX-METAL WASTE TOTAL CYANIDE 5.000 5.000 29.5000 147.50 Item # W-CN

REPORTED ON 7-22-91

PLEASE RETURN SECOND COPY OF INVOICE WITH PAYMENT TO ASSURE PROPER CREDIT.

SUB TOTAL 897.50
TAX 0.00
TOTAL 897.50

NET TO PAY 897.50

RODUÃO

SHIP VIA

RODNEY L: JACOBS ATTORNEY AT LAW

HMVOIGE

1500 SHURE DRIVE

ARLINGTON HTS., IL 60004

DATE NUMBER

PAGE

DUE DATE

YOUR #

8.000

3 07/29/91 3 37480

ORDERED

8.000

08/28/91

TERMS €0,0, N30 OUR#

54-999

EIGHT WATER SAMPLES RECEIVED 7-09-91 RE: LOU MAIORANO PROJECT

FOR ANALYSIS

REGULAR METAL BY AA Item # RM SPECIAL METAL BY AA Item # SM Item # SM

W.W. TOTAL CYANIDE

Item # CN-T

16.000 16.000 13.0000 208.00

15.0000

24.0000

120.00 192.00

REPORTED ON 7-22-91

PLEASE RETURN SECOND COPY OF INVOICE WITH PAYMENT TO ASSURE PROPER CREDIT.

> SUB TOTAL TOTAL

520.00 0.00 520.00

NET TO PAY

520.00

APPENDIX: A



EMSL ANALYTICAL INC.

Aces Maintenance P.O. Box 945

Wheaton, IL 60187

Matrix: Soils

Lab ID: #16517-#16532

Received: 11-22-91 Reported: 12-11-91

#16528 - C2-2

Attn.: Ray Denye

Ref.: 1850-1860 N. Elston Ave., Chicago, IL 60622

" " #16520 - A2-2 " " #16521 - B1-1

* " #16521A - B1-1&-2 Comp.

" " #16522 - B1-2 " " #16523 - B2-1 " " #16524 - B2-2

*Note: Analyzed as instructed.

Parameter_	<u>#16517</u>	<u>#16519</u>	#16521A
PRIORITY POLLUTANTS			
Metals, mg/kg:		<i>~</i> •	2.2
Antimony	2.6	6.1	33
Arsenic	13	19	29
Beryllium	<10	<10	<10 7.8
Cadmium	4.4	<4.0	/.e <50
Chromium	92	<50	230
Copper	360	3.9	3000
Lead	590	420	<0.1
Mercury	<0.1	<0.1	620
Nickel	230	350	<0.5
Selenium	<0.5	<0.5	<10.5
Silver	<10	<10	<0.5
Thallium	<0.5	<0.5	640
Zinc	830	810	640
Cyanide	<0.12	<0.12	0.36

Page 1 of 2



EMSL ANALYTICAL INC.

Aces Maintenance

Matrix: Soils

Lab ID: #16517-#16532

Attn.: Ray Denye

Parameter PRIORITY POLLUTANTS	<u>#16525</u>	<u>#16527</u>
Metals, mg/kg:		
Antimony	0.63	<0.5
Arsenic	15	3.9
Beryllium	<10	<10
Cadmium	<4.0	<4.0
Chromium	<50	<50
Copper	20	24
Lead	<25	<25
Mercury	<0.1	<0.1
Nickel	480	47
Selenium	<0.5	<0.5
Silver	<10	<10
Thallium	<0.5	<0.5
Zinc	240	38
Cyanide	<0.12	0.93

Reviewed and approved by

Sherree A. Baker Laboratory Manager

Page 2 of 2

82

3 Cooper Street
Westmont, New Jersey 08108
609-858-9573

Chain of Custody / Analysis Request Form

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Way Bill #	

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ENS ANALYTICAL INC
3 Cooper Street
Westmont, New Jersey 08108
600_85R_9573

Chain of Custody / Analysis Request Form

	V
Tracking #	
Way Bill #	

Custody and Sample Information - Complete ALL information. Put N/A in blanks not applicable. Press firmly.

					2. Sampling Site Address													Indicate Analysis Requested									
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APPENDIX: B

PREVIOUS RECORDS FROM
AERO PLATING FOR CLOSURE



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UNIFORM HAZARDOUS Generator s	US EPA ID No	Manifest	Ž Þage	Informat	100 in (h	e shaded areas d by Federal
WASTE MANIFEST 7/ DOO Generator's Name and Mailing Address	5125836	Document No	ot f	law		
AERO PLATING 1860 N	EL (TON)	CHICAGO	C	ate Manifest	623	556
Generator's Phone (3/2) 276.3260 Transporter 1 Company Name		606 22 Number	03	Generator's 3/6236	001	
Transporter Company Name	G US EPA ID	Number	C. State	e Transporter's	10	7075
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TOTAL P.02

APPENDIX: C

L A B O R A T O R I E S
A C C R E D I T A T I O N S

The State of Wisconsin

DEPARTMENT OF NATURAL RESOURCES

Hereby attests that



QUALITY ANALYTICAL LABS, INC.

998001100

Laboratory ID Number

has qualified as a

Certified Laboratory



under the provisions of ch. NR 149, Wisconsin Administrative Code

This certification includes the following test categories:

General II

Metals !

Metals II As Hg Se

Cyanide Total Phenols Organics; Purgeable
Organics; Base/Neutral

Organics: Acid

Liquid Chromatography

Secretary

Department of Natural Resources

Administrator, Division of Environmental Standards

Department of Natural Resource

Director, Office of Technical Services Department of Natural Resources

This certification is valid from December 19,1991 until June 30, 1992, and rescinds all previous certificates.

Form 4800-10

9-87

Certificate of Membership



AMERICAN COUNCIL OF INDEPENDENT LABORATORIES

THIS CERTIFIES THAT AS OF JULY, 1991

Quality Analytical Labs, Inc.

HAVING QUALIFIED BY MEETING THE REQUIREMENTS OF MEMBERSHIP AND HAVING SUBSCRIBED TO THE CODE OF ETHICS OF THIS COUNCIL HAS BEEN ELECTED A

MEMBER

Law Krashes

President



GOVERNMENT INSTITUTES, INC. Washington, DC

Certificate of Achievement

This is to certify that

Doug Weir

has successfully completed a special concentrated course on

Fundamentals Of Illinois Environmental Law Compliance Course

Participation in this continuing education endeavor demonstrates interest in personal development and career advancement.

This course is accredited for **7.5** continuing education units (CEUs).

April 10, 1991

President

Thomas F. P. Sullivan

United States Department of Commerce National Institute of Standards and Technology



Certificate of Accreditation

ELECTRON-MICROSCOPY SERVICE LABORATORIES, INC.

is recognized under the National Voluntary Laboratory Accreditation Program for satisfactory compliance with criteria established in Title 15, Part 7 Code of Federal Regulations.

Accreditation is awarded for specific services, listed on the Scope of Accreditation, for:

AIRBORNE ASBESTOS FIBER ANALYSIS

July 1, 1991

Effective until



Mancy M. Dakey
For the Stional Institute of Standards and Technology

STATES OF "

Control LABORATORIES INC.
ROdney L. Jacobs
Page Two

ra se 💝 💝 esperiore sono

Lab No: 54-999 July 22, 1991

RRSULTS:		Concentration in pon (mg/L)				
\	Stable ID:	Total CYADIGE	05 Hexavalent Chromium	Nickel		
K	Rinsewater Comp. 3 Spots in Basement Area	0.70	<0.01	48.8		
(3)	Rinsewater Comp. 2 Spots in Area of Former WW Pretrimt Equip	2.80	3.83	31.2		
(3)	Rinsewater Comp. 3 Spots in Former Area used to Store Process CR Sol'n	2.55	<0.01	39.1		
	Rinsewater Comp, 2 Spots in Area A	0.25	<0.01	22.8		
***	- Control Sample Frash H20 used to rinse WW Trt & CR Sol'n Storage Areas	<0.01	<0.01	≪0.05 ****		
•	Control Sample Fresh H2O used to rinse Area A & Dasement	<0.01	<0.01	<0.05 ⊶		
*****	- Control Area B	<0.01	<0.01	<0.05		
(5.	RW Comp. 3 Spots in Area B	0.30	2.20	2.9		

Respectfully submitted,

SCIENTIFIC CONTROL LABORATORIES, INC.

ĥУ

CK:Clm

CERTIFICATION:

The above statements and report were subscribed and sworn to before me this THENTY-SECOND day of JULY, 1991.

Colette Rohan

TO:

U.S. Environmental Protection Agency

Region V

230 South Dearborn Street Chicago, Illinois 60604

RE:

Aero Plating Works, Inc. 1860 North Elston Avenue Chicago, Illinois 60622

SUBJECT: Closure and Post Closure Plan

DESCRIPTION OF FACILITY:

The premises occupied by Aero Plating Works, Inc., as a tenant, is a brick and concrete structure containing one story and basement with internal heating plant.

WASTE RETENTION AREAS:

The area where hazardous wastes (sludges, etc.) and chemicals were stored was within the plant on the main level on concrete floors. Any and all liquids from processing and possible spills went to floor drains connected to public sewers. No wastes or chemicals from processing or spills could reach the surface or ground waters to interfere with or endanger the environment.

TYPE OF STORAGE:

The company only stored its process wastes and accepted no wastes from outside sources.

METHOD OF STORAGE:

All wastes were stored in 55 gallon steel drums which were plastic lined. No wastes were stored in open tanks.

SPILLS OR LEAKAGE:

The principal of the corporation affirms that there never was a spill or leakage in the plant from any of the containers and it follows that there could be no contaminants that migrated from the interior to the outside of the plant to endanger the environment.

QUANTITY STORED:

The maximum accumulation of hazardous (listed) wastes was 49-55 gallon drums or 2695 gallons. Part of these drums contained wastes that were of current (less than 90 day) accumulation of process sludges.

INTERFERENCE WITH THE ENVIRONMENT:

Because of the structure of the building (concrete and masonry with a complete sewer system the site poses no present or future threat to the environment (land,

surface water or ground water) as all wastes had been contained. There was no storage of hazardous wastes on the exterior of the building.

CLOSURE:

The storage facility has now been made ready for successful closure and inspection. There is an old plating line consisting of a series of tanks and overhead rails. All tanks have been drained and triple rinsed ready for disassembly and moving. One remaining tank contains nickel sulphate which is waiting for transportation to another facility for regeneration by addition of water for use as nickel plating solution.

CERTIFICATION:

Upon certification by either Simon P. Gary and/or Frank Altmayer, both registered engineers, that the site has been cleared and contains no residual hazardous (listed) wastes the site will be closed permanently.

AERO PLATING WORKS, INC.

Ву		
	Louis Maiorano, Jr.	
	President	

di^e

ACES MAINTENANCE

November 12, 1992

Mr. John Breslin U S EPA CS-3T 77 West Jackson Chicago, Illinois 60604

Re: Closure Plan 1850-1860 North Elston

Chicago, Illinois

Dear Mr. Breslin:

Enclosed please find a proposed plan for closure of the AERO Plating Company. Corrective action has been completed in the basement of the 1860 North Elston Building. Recommendations are suggested for the remediation work in the 1850 North Elston Building. If this plan meets with your approval, closure operation can be completed within sixty (60) days.

This report was not meant as a closure document by any means, but some of the material included in this report will be submitted with the final closure documents. A complete pictorial documentation has been completed for the work done todate. This will also be submitted with the final closure report.

Please contact me when you receive this report.

Sincerely,

ACES MAINTENANCE

Daniel T. Coyne
Daniel T. Coyne

DTC/bc

Enclosure

ACES MAINTENANCE

SITE CLEANUP AND CLOSURE REPORT

FORMER AERO PLATING COMPANY 1850-1860 North Elston Chicago, Illinois

Seymour Shiner

May 15, 1992

SITE CLEANUP AND CLOSURE REPORT
FORMER AERO PLATING COMPANY
1850-1860 North Elston
Chicago, Illinois

Seymour Shiner

May 15, 1992

PREVIEW

This report has attempted to create continuity between the initial closure plan submitted by Scientific Control Laboratories, Inc., dated May 6, 1988, the conditional closure plan response submitted by the Illinois Environmental Protection Agency dated June 10, 1988, the test report by Scientific Control Laboratories, Inc. dated July 18, 1991 and test report dated July 22, 1991, the initial sampling conducted by ACES Maintenance dated December 11, 1991, the cleanup operation conducted by ACES Maintenance from October, 1991 to April, 1992, the ACES Maintenance clearance testing dated April 7, 1992 -- April 21, 1992, and the suggested procedures to clean up the remaining portions of the building to conclude final approved EPA closure. Creating a cohesive closure plan has been difficult because of the informal termination of the

previous plating operation and the haphazard renovation of the building.

Closure records have been limited. Mr. Shiner has inherited the responsibility of closure only through the role of new owner of a building previously used as a plating operation. The previous owner did not follow acceptable EPA protocol for closure and the obligation has now been passed to Mr. Shiner.

To verify that the previous decontamination processes at the facility have resulted in a satisfactory decontamination, and not to duplicate previous testing, subsurface testing has been conducted under the supervision of a professional engineer, James McElroy. The subsurface testing was conducted in three specific areas. The first area tested was formerly the chemical storage room in the southwest corner of the one story building. This area was used to store sludge from the nickel treatment. This area has been labeled Storage Area B. The second test area was in the Northeast portion of the basement in the two story building. The third area of sampling was in the northeast corner of the one story building previously used for wastewater treatment equipment.

It is hoped that this report will be approved by the Illinois EPA and ACES Maintenance professional engineer, James McElroy will continue to supervise the remaining clean up and execute the closure certificate.

BACKGROUND AND DESCRIPTION OF FACILITY

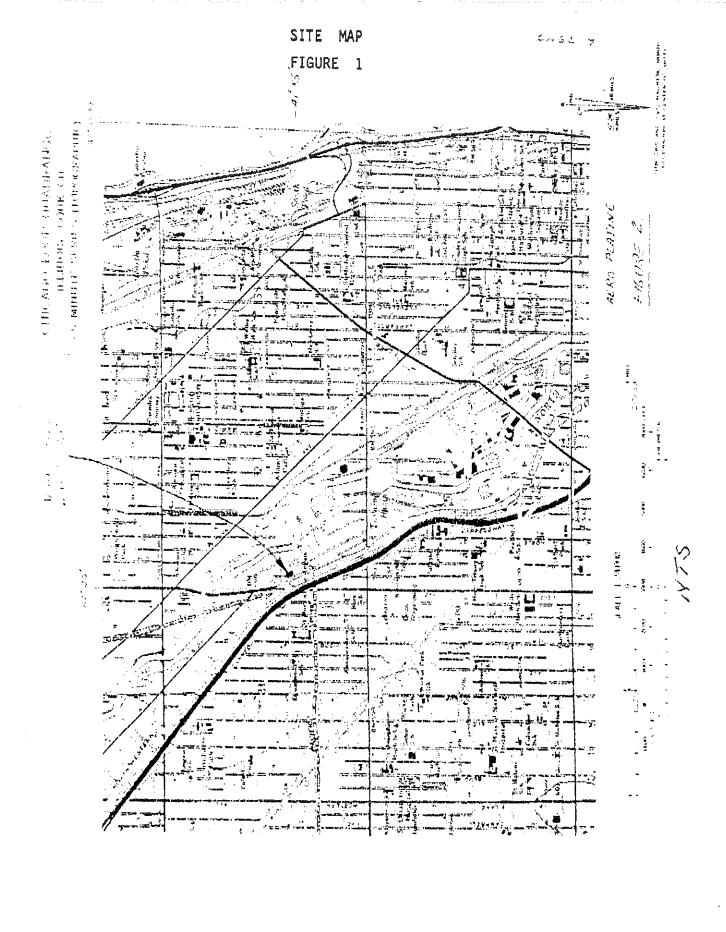
Seymour Shiner owns a building at 1850-1860 North Elston, Chicago, Illinois that was formerly owned by AERO PLATING COMPANY. (See Figure 1 & 2) In 1988, AERO PLATING COMPANY ceased operations and started to dispose of its operation. The closure of the AERO PLATING COMPANY activity was not documentated or in compliance with 35 ILL APM CODE Section 725.211, under the provisions of 29 CFR 1910 (51 FR 15, 654 December 19, 1986) or 35 ILL ADM CODE Section 702.126.

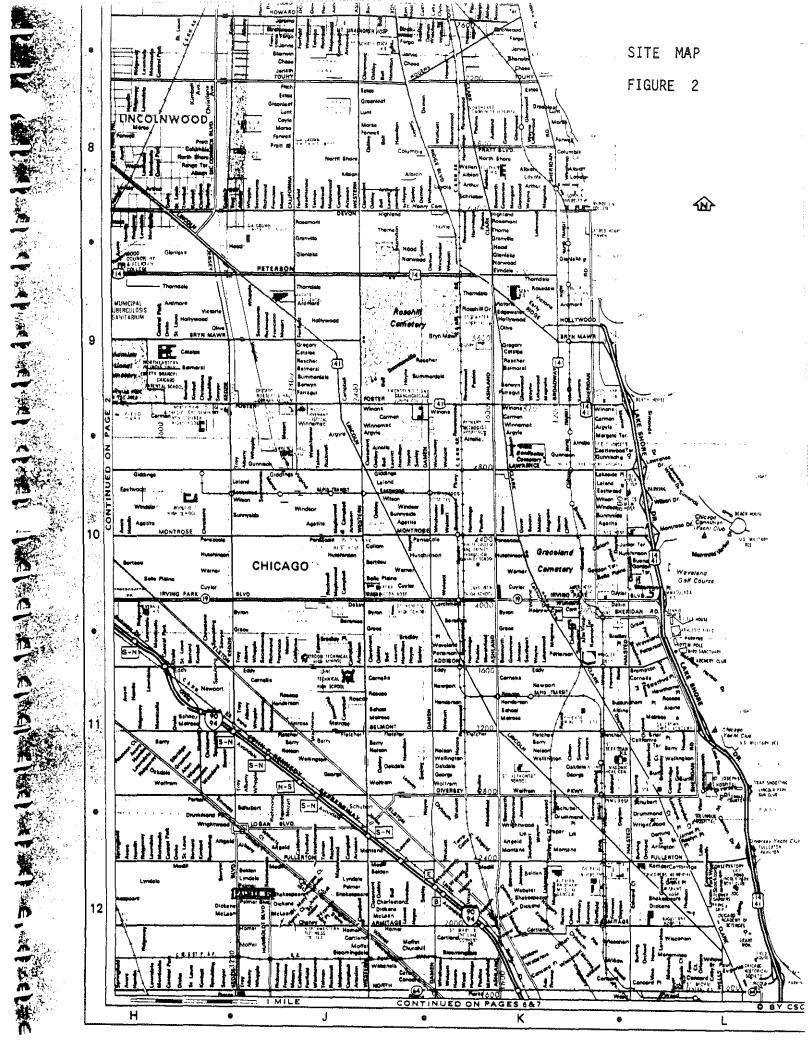
Mr. Shiner as a new property owner has contracted with ACES Maintenance to supervise the cleanup and decontamination of the former metal plating process and hazardous waste storage areas located within the facility.

All cleanup activities will be supervised by a certified hazardous material supervisor and/or a professional engineer. ACES Maintenance was also requested to perform any sampling necessary to confirm that the site is properly decontaminated and that future risks are minimized.

All plating activities were discontinued in the early part of 1988. At that time the process equipment and plating solutions were removed from the facility.

It is understood from conversations with the facility owner,
Louis J. Maiorano, Jr. that no hazardous wastes were stored on-site for
periods greater than 90 - Days or treated in this facility. Waste solutions
generated during the plating process were temporarily stored in drums and
staged in the hazardous waste storage area pending disposal at a certified
disposal facility. AERO generated and stored less than 100-kg of hazardous





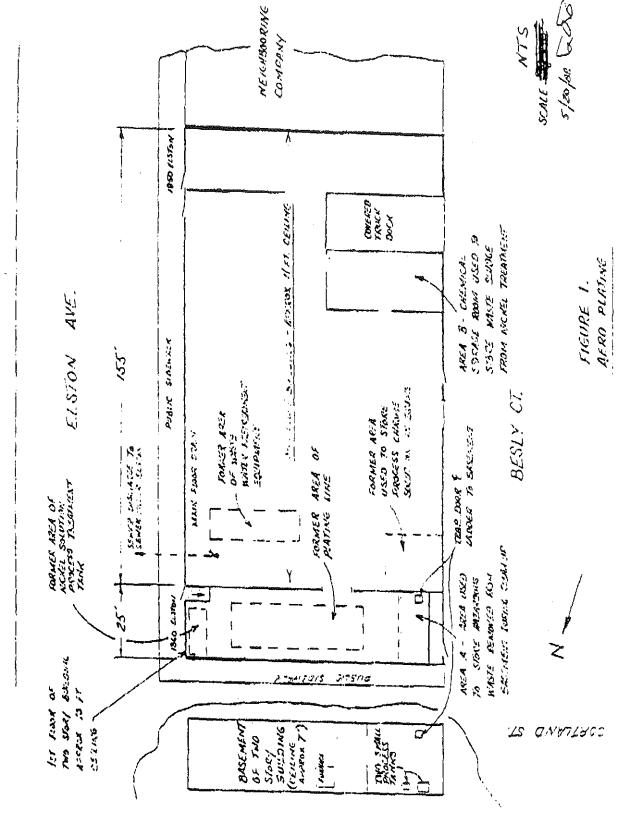
waste per month and did not exceed a total of 6,000-kg at any time. When plating operations ceased, the waste solutions were consolidated, labeled, and temporarily stored in an adjacent room before disposal at a licensed disposal facility. No hazardous waste is currently being generated or stored at this facility. This progress report specifically addresses the cleanup and decontamination of the metal plating process and hazardous waste storage area.

DESCRIPTION OF THE FACILITY

The facility consists of a single story building occupying 1850 North Elston and a two story building at 1860 North Elston. Metal finishing and material handling operations were conducted in both buildings. The waste solutions generated from the metal finishing process were temporarily contained in above ground tanks in the storage area (See Figure 3). The

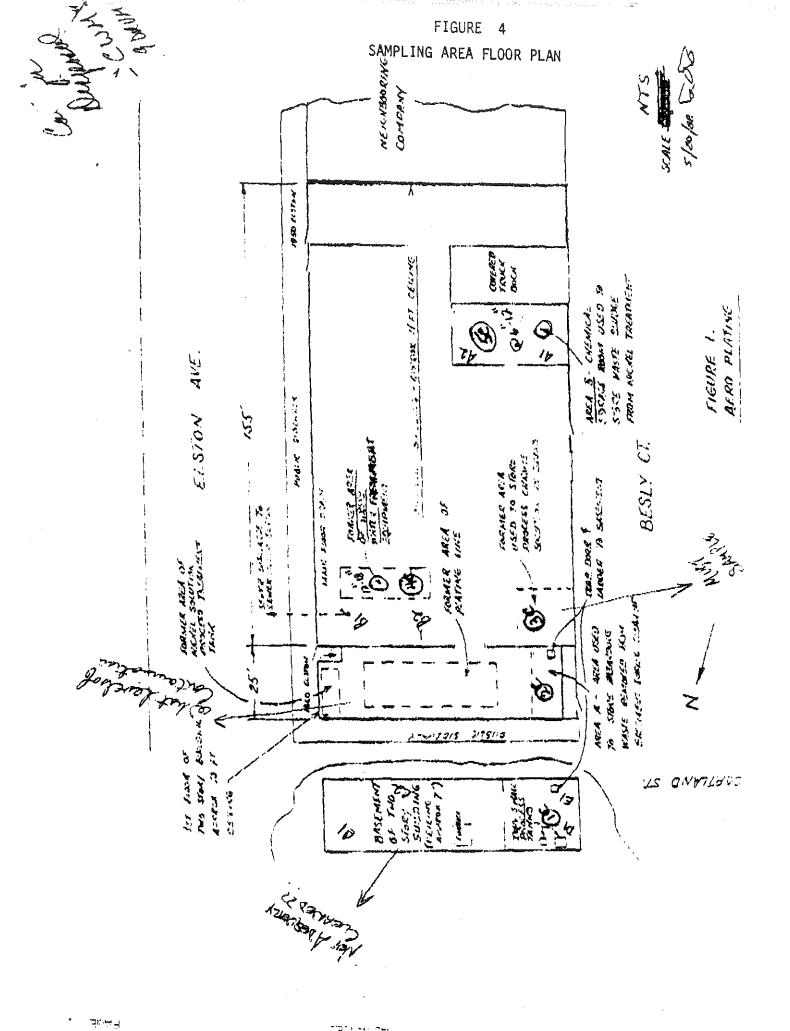
storage tanks were already removed from the building. The process and storage area was separated from the rest of the building.

The structural integrity of the concrete floor in the process and storage area was examined and found to be in good condition considering the age of the building.



SAMPLING

ACES Maintenance has conducted sampling of the concerned storage areas to determine if contamination has occurred. Soil borings have been conducted in the basement, former area of nickel solution process treatment tank, former area of waste water treatment equipment and chemical storage room used to store waste sludge from nickel treatment, storage area "B". Probe holes were installed to a depth of approximately 2 and 4 feet below the ground surface. A stainless steel sampling spoon was used to collect soil samples at various depth. The sampling spoon was decontaminated between sampling events by scrubbing with non-phosphate detergent and triple rinsing with deionized water. (See Figure 4)



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SITE ACTIVITIES TO DATE

Clean up and decontamination operations commenced on for the basement area of 1860 North Elston, Chicago, Illinois. All clean up operations were conducted following the provisions stated in 29 CFR Part 1910, and all other applicable requirements stipulated by OSHA (Hazardous Waste Operations and Emergency Response). These requirements include hazard communication, medical surveillance, health and safety programs, decontamination, and proper supervision and training. Site workers engaged in the cleanup activities were equipped with Level "C" personal protective equipment and supervised by a certified hazardous materials supervisor. Constant air monitoring for chlorine using compound-specific Drager tubes was conducted at approximately 30-minute intervals, before, during, and after the cleanup activities. An ABC fire extinguisher and a complete first aid kit were available at all times.

The floor and all walls within the metal plating process and hazardous waste storage area in the basement were sprayed with a decontamination solution. The decontamination solution contained: trisodium-phosphate (3-oz/gal.), a metal complexing agent; calcium hypochlorite (19%), an oxidant used for cyanide destruction; and water. The decontamination solution was adjusted to a pH of approximately 5. The floor was scrubbed with a decontamination solution using an industrial floor scrubber. After the whole area had been thoroughly scrubbed, a high

pressure sprayer was used to triple rinse the area with water.

Staining was observed on the floor after the third rinse had been completed. A scarifier was then used to strip the top layer of concrete from the floor and remove the stains. Following scarification, the floor was again scrubbed with the decontamination solution and rinsed.

Measurements were made in the field for cyanide and residual chlorine using a spot test kit and starch paper, respectively.

Two probe holes were made 4 feet below the surface. A stainless steel sampling spoon was used to collect soil samples at various depths (2 and 4 feet). The sampling spoon was decontaminated between sampling events by scrubbing with a non-phosphate detergent and triple rinsing with deionized water. All samples were labeled prior to transport to a certified independent commercial laboratory following standard chain-of-custody procedures. The soil sampling locations are presented in Figure

All equipment used in the work area was properly decontaminated following cleanup activities. All equipment was scraped to remove waste residue, washed using the decontamination solution, and rinsed thoroughly with water. All waste residue and rinse water was handled as hazardous waste.

LABORATORY ANALYSIS

Soil samples collected from beneath the facility floor were

analyzed for cyanide using EPA SW-846 Method 9010 and for total metals. The results of the laboratory analyses are presented in Table 1. All chemical analyses were performed by Quality Analytical Labs, Inc. of Lisle, Illinois and EMSL Analytical, Inc. of Westmont, New Jersey. A copy of the laboratory reports are included in Appendix A -- See Figure 5.

FIGURE 5
CHEMICAL ANALYSIS OF SOIL

		SAMPLING LOCATIONS			
	A1-1	A2-1	B1-1&2 Composit	e C1-1	C2-1
PARAMETERS	(2 Ft.)	(2 Ft.)	/ (2 Ft.)	(2 Ft.)	(2 Ft.)
Antimony	2.6	6.1	33	0.63	<0.5
Arsenic	13	19	29	15	3.9
Beryllium	< 10	<10	< 10	< 10	<10
Cadmium	4.4	<4.0	7.8	∠4.0	∠4.0
Chromium	92	< 50	∠ 50	< 50	< 50
Copper	360	3.9	230	20	24
Lead	590	420	3000	< 25	∠25
Mercury	<0.1	<0.1	< 0.1	< 0.1	∠0.1
Nickel	230	350	620	480	47
Selenium	∠0. 5	<0.5	∠0.5	<0.5	∠0.5
Silver	<10	<10	< 10	< 10	∠10
Thallium	<0.5	<0.5	<0.5	<0.5	∠0.5
Zinc	830	810	640	240	38
Cyanide	< 0.12	<0.12	.36	<0.12	.93



Job #: 11993 AMENDED

Date: 04/06/92

Aces Maintenance P.O. Box 511 Wheaton, IL 60189

ATTN: Dan Coyne

Sampling Date: 03/24/92 Analyses Date: 03/25-31/92

Identification:

One sample taken by Aces Maintenance personnel

identified as:

ACES MAINTENANCE

Results follow:

Sample ID: 1860 BASEMENT

PRIORITY POLLUTANT METALS Method: Standard Methods

Chromium: Nickel:	MDL (mg/L) 0.05 0.03	Analysis (mg/L) 1.3 7.9
pH:		8.63
Hex Chrome:	0.20	1.2
Cyanide:	0.5	BDL

MDL = Method Detection Limit
BDL = Below Detection Limit

Respectfully submitted,

Nacholas Cuzzone

Lab Manager

Quality Analytical Labs, Inc.



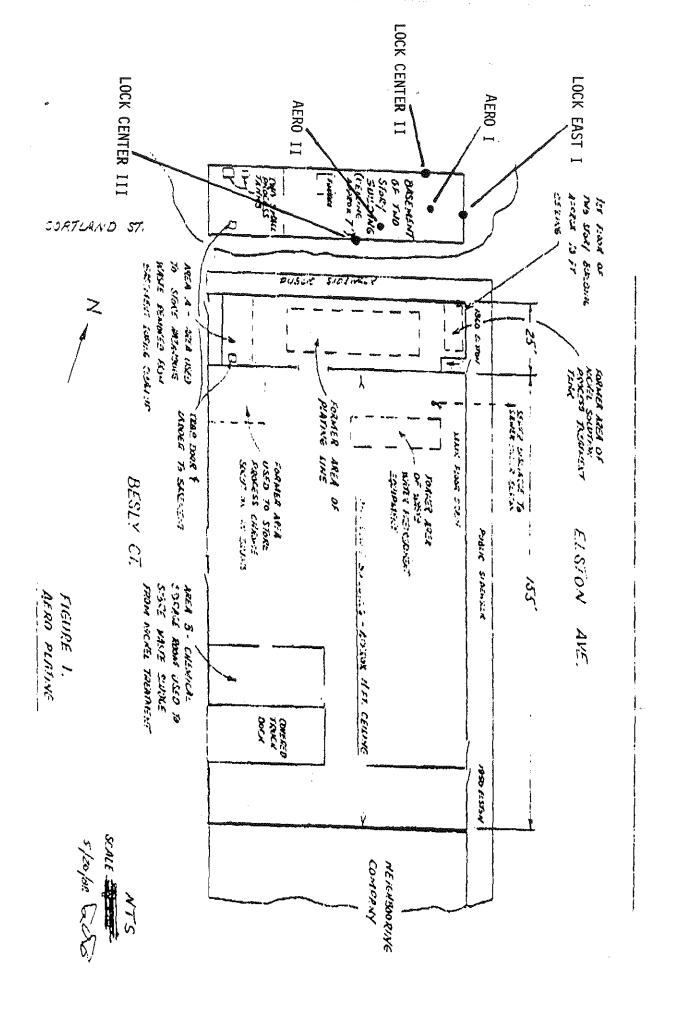
ress
AIN OF CUSTODY RECORD, WP 60189

10. Mantened

690-0189

690-0189

11993 1938-C University Lane * Lisle, IL 60532 * (708) 512-0061 **CHAIN OF CUSTODY RECORD** PROJECT NUMBER PROJECT NAME HCES Maintenance NO. SAMPLERS: (Signature) OF CON-**REMARKS TAINERS** ITEM NO. STA. NO. DATE TIME STATION LOCATION 1860 Basement 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 Relinquished by: (Signature) Date/Time Received by: (Signature) Relinquished by: (Signature) Date/Time Received by: (Signature) Relinquished by: (Signature) Received by: (Signature) Date/Time Relinquished by: (Signeture) Date/Time Received by: (Signature) Relinquished by: (Signature) Date/Time \ Pacejved, for/Laboratory by: v Remarks





Job #: 12110 AMENDED

Date: 04/07/92

Aces Maintenance P.O. Box 511 Wheaton, IL 60189

ATTN: Ray Dayne

Sampling Date: 03/20/92

Analyses Date: 03/20-04/01/92

Identification:

Two samples taken by Ray Dayne identified as:

AERO

DISPOSAL PROFILE

Results follow:

Method: Standard Methods

Sample ID: AERO I	MDL (mg/L)	Analysis (mg/L)
TCLP Nickel: TCLP Chromium: Total Hex Chrome:	0.1 0.1 2.0 mg/Kg	1.1 BDL BDL
Sample ID: AERO II	MDL (mg/L)	Analysis (mg/L)
TCLP Nickel: TCLP Chromium: Total Hex Chrome:	0.1 0.1 2.0 mg/Kg	0.7 BDL BDL

MDL = Method Detection Limit
BDL = Below Detection Limit

Respectfully submitted,

Nicholas Cúzz∕o#é Lab Manager

Quality Analytical Labs, Inc.

Job #: 12557 Date: 04/21/92

EBLLETE

- J.

Aces Maintenance P.O. Box 511 Wheaton, IL 60189

ATTN: Dan Coyne

Sampling Date: 04/07/92 Analyses Date: 04/10-21/92

477-422-1962 (John CO FAGA) (June CO) ADAL (June 14-65)

Identification:

Four samples taken by Dan Coyne identified as:

1860 N. ELSTON

Results follow:

Method: Standard Methods

Sample ID: 1860 N. ELSTON (NORTH WALL)

MDL (mg/Wipe) Analysis (mg/Wipe)

Total Chromium 0.01 BDL

Nickel 0.01 BDL

Sample ID: 1860 N. ELSTON (EAST WALL)

MDL (mg/Wipe) Analysis (mg/Wipe)

Total Chromium 0.01 BDL

Nickel 0.01 BDL

Job #: 12557 Page 2 of 2

Method: Standard Methods

AAAALEETIAAE OEKOT OKU

Sample ID: 1860 N. ELSTON (SOUTH WALL)

MDL (mg/Wipe)

Analysis (mg/Wipe)

BDL

BDL

431484 4.01

0.05

Sample ID: 1860 N. ELSTON (WEST WALL)

MDL (mg/Wipe)

Analysis (mg/Wipe)

0.05

MDL = Method Detection Limit
BDL = Below Detection Limit

Respectfully submitted,

Nycholas Cuzzone

Lab Manager

Cyanide

Cyanide

Quality Analytical Labs, Inc.



EMSL ANALYTICAL INC.

Aces Maintenance P.O. Box 945 Wheaton, IL 60187 Matrix: Soil
Lab ID: #02264
Paccived: 11-22-

Received: 11-22-91 Add.Test Rop.: 4-07-92

Attn.: Ray Denye

Ref.: 1850-1860 N. Elston Ave., Chicago, IL 60622

A2-2, Prev. Lab ID #16520

Parameter #02264

Regulatory
TCLP Extraction RCRA Metals, mg/l:
Chromium <0.05 5.0
Nickel 1.3

The above enalyses were performed on a TCLP leachate of the submitted waste prepared according to the procedure specified by final rule in 40 CFR, June 29, 1990. Regulatory levels have been established and are listed next to each parameter.

Reviewed and approved by

Sherree A. Dakaw Laboratory Manager

md



1938-C University Lane • Lisle, IL 60532 • (708) 512-0061 **CHAIN OF CUSTODY RECORD** PROJECT NUMBER NO. SAMPLERS: (Signate OF CON-TAINERS ITEM NO. STA. NO. STATION LOCATION 1 2 3 5 6 7 8 9 10 11 12 13 14 15 Date/Time Received by: (Signature) Relinquished by: (Signature) Date/Time Received by: (Signature) Relinquished by: (Signature) Date/Time Received by: (Signature) Relinquished by: (Signature) Relinquished by: (Signature) Date/Time Received by: (Signature) Remarks Relinquished by: (Signatule) Date/Time

WORK PLAN

Personne1

During the course of the project, the crew consisted of a response manager, project control specialist, chemist, laboratory technician, equipment operator, two cleanup technicians, and occasionally the health and safety officer. The Crew composition varied from day to day depending upon the nature of the tasks to be performed for that specific day.

Equipment

Major pieces of equipment utilized during the project included the following:

- * Assorted hand tools
- * Bobcat, 800 Series, with forks and bucket and grappler attachment
- * Decontamination line
- * Drum cart
- * Emergency lighting
- * Generator
- * Laboratory equipment
- * Ladder
- * Level A protective equipment
- * Level B protective equipment (i.e., compressed air, airline supplied escape pack units, other supplied air appurtenances)
- * Mobile laboratory hood
- * Mobile telephone
- * Overpack drums (85-gallon steel, 85-gallon poly)
- * Safety equipment (including shower, fire extinguisher, first aid kit, etc.)
- * Sampling equipment

For safety monitoring, a Sensydine HCN Meter should be present on site, as were two personnel HCN monitox meters and an oxygen/LEL meter. The aforementioned equipment should be throughout the active phase of the project.

WORK PROCEDURES

The following activities must be performed so all surfaces at the Aero Plating Works can be rendered free from hazardous contaminates as described by the USEPA.

All windows and doors must be sealed from the outside to prevent migration of cleaning solution to the exterior of the building. Disconnect main power supply to the building. Cover all electric devices with visqueen to provide a 100% effective water barrier. Plug all drains to prevent any cleaning solution or rinse water from draining into the city sanitation system. Provide properly grounded temporary power and lighting. All surfaces must be visually inspected and any residue adhering to the surfaces must be removed by scraping. Following this, the surfaces must be pressure washed using a tri-sodium phosphate water solution. Proportions shall be as recommended by the manufacturer for removal of nickel, cyanide, hexavalent chromium and total chromium. All areas then must be triple rinsed.

All wash solution and rinse water must be collected and stored and disposed of as a hazardous waste as described by the USEPA and the IEPA regulations. All expendable materials used in this cleanup shall be treated as hazardous waste. Random wipe tests shall then be performed to insure that surfaces are free from hazardous contaminants. If wipe tests prove to be positive this procedure must be repeated.

After all surfaces have been proven to be clean, a 2" thick 3000 PSI cementatious grout shall be placed on all floors. A steel troweled finish will be provided. A liquid concrete sealer will then be applied immediately following the troweling operation.

DECONTAMINATION OF SAMPLING EQUIPMENT AND MONITORING INSTRUMENTS

Select appropriate decontamination solution as listed in Table 10.

Instruments will be decontaminated by following the cleaning procedures of the manual for the particular instrument. All other equipment will be decontaminated by the following procedure in the order given:

- Wipe excessive contaminant (dirt, grease, etc.) off with a towel or cloth soaked with scapy water, hexane, or acetone, whichever is appropriate for the contaminant.
- Wash with soap water until all visible contaminant has been removed.
- Rinse three times with deionized or distilled water.
- Rinse two times with pesticide grade hexane.
- Rinse two times with pesticide grade acetons.
- Wipe with clean laboratory wipes to remove any excessive acetone and air dry or burn off any residual solvent with a propane torch.

NOTE:

If material is to be sampled for heavy metals or other inorganics, three rinses of a 10% nitric acid (reagent grade) must be inserted between Steps 2 and 3 above. Detailed procedures on decontamination are covered in ACES Health and Safety Manual.

Instruments for repair work and shipping to manufacturer must follow state and federal regulations.

ACES' policy on the return of repair material and lease of used equipment and instruments is to provide or obtain and record the following information:

- 1. Find whether the instrument or equipment has been exposed to any hazardous of toxic substance.
- If "Yes," find the name of the substance and an assurance that the material is decontaminated prior to shipment.
- The name and phone number of the individual providing the safety data on instrument/equipment is also recorded.

This information is required and maintained in accordance with federal regulations (DOT, SARA, and RCRA) and certain state "Right-to-Know" laws. Please be prepared with the above information while arranging to return the used or leased equipment or instrument.

CLEANING SOLUTION ANALYTICAL TO DETERMINE HAZARDOUS WASTE CHARACTERISTIC

TABLE 10
SELECTION OF DECON SOLUTIONS

Solvent	Contaminant (Solute)			
Methanol	PCB's, PCP, Pesticides, Phenols			
Methylene Chloride	Oils, Base Neutrals, Pesticides			
Hexane	Xylenes, PCB's, Chlorinateds			
Acetone	Phenois, PCB's			
Carbon Tetrachloride or Freon-11 (Trichloro-monofluoro-methane)	Oils, Fatty Materials			
Nitric Acid (10%)	Metals			

NOTE: Solvent-solute solubility relationships must be considered during decon solution selection.

EXPECTED CLOSURE DATE

Aero Plating expects its hazardous waste drum storage areas to be certified as being closed early in 1993. In order to affect this, the following amended closure schedule is being submitted.

Dates are based on the date of final approval of the closure plan by the IEPA as being Day "O".

By Day "30" Complete initial wipe tests of specified areas (Completed)

By Day "60" Complete any further decontamination of the facility if such cleaning was specified by the engineer. Have independent laboratory retest to verify decontamination of areas involved. (ACES Completed In 1860 North Elston Building.)

By Day "75" Complete testing of areas to verify decontamination.

(Completed By ACES)

By Day "95" Complete testing of any wastes generated during further cleaning activities. (Completed By ACES)

By Day "115" send any additional wastes to proper disposal or treatment site. (Not Necessary)

By Day "145" obtain all completed manifests from ultimate treatment or disposal site for any additional waste generated from the clean up activities. (Not Necessary)

By Day "30" have independent professional registered engineer certify closure of the facility in accordance with the provisions of this plan.

New Target Days

By Day "40" submit by certified mail, certification of closure by Aero Plating and the independent registered professional engineer to the proper environmental authorities.

Daniel T. Coyne, President

ACES MAINTENANCE

CLOSURE CERTIFICATION STATEMENT

The hazardous waste management units at the facility described in this document have been closed in accordance with the specifications in the approved closure plan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gethering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

	AERO PLATING		
USEPA ID Number	Facility Name		
Signature Of Owner/Operator	Name and Title		
	JAMES A. MC ELROY		
Signature of Registered P.E.	Name Of Registered P.E. and Illinois Registration Number		
Date			

SUMMARY AND RECOMMENDATION

AERO PLATING conducted a metal finishing and material operation for forty years in the aforementioned facility. During this time, AERO generated waste solutions that were stored on-site pending disposal at a certified facility. All plating and waste solutions were removed from the facility when plating activities were ceased in the early part of 1988. ACES Maintenance contracted to provide cleanup and decontamination of the former metal plating company's hazardous waste storage area and closure documentation.

Clean up and decontamination operations were performed on April 7, 1992 through April 21, 1992 for the basement of the 1860 North Elston building. All operations were conducted according to the provisions stated in 29 CFR Part 1910 and all other applicable requirements stipulated by OSHA. This clean up and decontamination has been completed and laboratory analytical test results indicate no hazardous chemical residue above action levels.

The second area of concern is the area in the one story building previously used as a wastewater treatment area. This area tested extremely high for lead and higher counts for copper and nickel. Investigation of the building alterations revealed this area was backfilled with a slag material from a foundry. This would explain the high lead content. The material is not a soil but mainly bits of ash and clinkers. The area of concern measured about 20 ft. by 30 ft. for a total area of 600 sq. ft. The fill material runs about three (3) feet deep in most areas.

ACES Maintenance recommends that this material be removed and back-filled with gravel. A concrete floor should be poured to cover the new gravel fill. The cost for this operation is estimated to run about \$30,000.00 Dollars. An alternative to this approach would be to grind the existing floor cracks and fill with caulk. The entire floor should then be sealed with an encapsulating material and topped with a three inch thick 3000/PSI cementations grout. These remediation suggestions await approval from the State of Illinois Environmental Protection Agency.

The final area requiring some form of remediation is the area in the one story building along the truck dock previously used as chemical storage for waste sludge from the nickel treatment. This area is now occupied by a tenant warehousing and selling hospital supplies. This area represents about 300 sq. ft. A very elaborate sterilizer has been constructed in this space as part of the new business. This area tested moderately high for nickel in both the Scientific Laboratories and ACES Maintenance test results. The recommendation for clean up in this area would be to follow the wash and rinse protocol previously conducted in the basement area of the 1860 Building. Random wipe tests should be performed to insure that the surfaces are free from hazardous contaminants. After all surfaces have been proven to be clean a two inch thick 3000/PSI cementations grout should be placed on the floor. A steel troweled finish should be provided and a liquid concrete sealer should be applied following the troweling operation.

This report is respectfully submitted for your approval.

PREVIOUSLY SUBMITTED CLOSURE PLAN

STATE REVISED CLOSURE PLAN

INITIAL SCIENTIFIC SAMPLE REPORTS
AND DOCUMENTATION



Scientific

CONTROL LABORATORIES, INC.

TESTING · RESEARCH · CONSULTING

May 6, 1988

Mr. Louis J. Maiorano, Jr. 422 Mill Valley Palatine, IL 60067

Subject: Closure Plan for Aero Plating Works, Inc.

FOREWORD;

This closure plan is being adopted in order to meet the requirements of United States Environmental Protection Agency and Illinois Environmental Protection Agency regulations regarding the closure of a hazardous waste storage facility. A closure plan had previously been submitted to the IEPA, but certain deficiencies had been specified by the IEPA which prevented the agency from accepting the plan. We are attempting to address all of the items specified by the IEPA in their response letter of Dec. 10, 1927.

I. DESCRIPTION OF FACILITY:

Aero Plating Works, Inc. operated a job shop electroplating facility under SIC code 3471 in an establishment encompassing two connected buildings. The street address of the establishment was:

1850-1860 North Elston Ave. Chicago, IL 60622

At the time of interest nickel and chromium plating were the specific types of electroplating being carried out at Aero Plating. The plating operation was a hazardous waste generator under USEPA identification number ILD005125836. A plan of the facility is attached as Figure 1. A copy of the appropriate portion of the 7.5 minute U.S. Geological Survey quadrangle map is attached as Figure 2. The drawings of the facility address the situation which existed in early 1984 at the time of the IEPA inspection. The facility had operated at these buildings over a forty year period. At no time did the company intend to become a

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hazardous waste storage facility. In error the facility had violated the requirement that a hazardous waste generator limit the storage of waste generated on site to a period of less than 90 days.

This closure plan specifically addresses all those areas of the facility which contained the hazardous waste for more than 90 days. Other areas of the facility which were only part of the electroplating operation and therefore not involved in any storage operations are shown in the drawings and are addressed in this plan, but are not considered to be of primary concern for testing since these areas were not exposed to storage facility hazardous waste. Areas have been addressed by the IEPA which were not part of the storage facility. We will attempt to meet any such requests for confirmation of the clean condition of specific areas in order to responsibly expedite the closure of the entire facility in such a manner so as to protect the environment and the public health.

The company is no longer in business. The closure of the storage facility will be a complete and final closure of the facility. The facility is no longer a generator of hazardous waste.

The smaller, two story building currently is the site of offices on the second floor and a cabalet, art gallery, theater on the first floor. The basement is not in use. The larger single story building is being used by a furniture firm at the northern end for rattan furniture manufacturing and a furniture showroom. Most of the single story building is not currently in use. All of these operations are independent and unconnected with Aero Plating. They are renting the buildings from the owner of the buildings. Both buildings are of brick masonry construction. The floor in the single story building is of concrete construction. A normal amount of cracks have occurred in the floor of the building (one or two cracks per 1000 square feet seems normal for a building this age) and have been filled with a cement grout type of crack filling material. The first floor of the two story building has a floor of a combination concrete and chemical resistant brick construction in most of the area and a concrete construction near the west end. The floor is in good condition and has been painted. The basement floor is of concrete

The main floor drain for process liquids from both building was near the southeast corner of the one story building. The effluent was directed to the publicly owned sanitary sewer in Elston Avenue after pretreatment.



In the process of deasing operations as an electroplating business all process chemicals were drained from the tanks, drummed, and sold for use as electroplating chemicals. All process equipment was triple rinsed and the acid bearing tanks neutralized with a caustic rinse. One cyanide bearing tank was triple rinsed and treated with sodium hypochlorite to oxidize any residue. Since ceasing operation as a business was part of normal business procedures and not closure of a hazardous waste storage facility the cleaning and disposal of these pieces of equipment and the processing chemicals are not considered in this closure plan as being part of the hazardous waste storage facility closure. Releases of rinse waters from an electroplating operation which are within the limits of the local control authority for the publicly owned treatment works are not normally considered to be releases of hazardous waste, Decontamination of equipment and areas related to a business operation generating hazardous waste are not normally subject to the same requirements as the closure or a hazardous waste storage famility. Good business practice involves good housekeeping procedures in cleaning up a building when a company ceases operation at the site. Such housekeeping procedures were carried out in ceasing the electroplating operation at Aero Plating. General cleaning and painting was done to provide a desirable building for the next tenant. This general cleaning of areas not used for hazardous waste storage is not considered to be part of the nazardous waste storage facility closure plan.

Closure Certifications:

Aero Plating made a conscientious effort to quickly clean-up the facility after the IEPA inspections. Through lack of knowledge an independent registered professional engineer was not retained at that time to supervise the clean-up operations. Since these actions have been completed the normal reference made to the direction of an independent registered professional engineer during the clean-up operations cannot be made. The responsible party from Aero Plating, Mr. Louis J. Maiorano, Jr., has at this time retained an independent testing laboratory and an independent registered professional engineer to direct the completion of the closure. We would hope that any recommendations or directions from the Illinois Environmental Protection Agency concerning this closure plan can take this condition into account in order to allow the completion of the closure activity in such a manner so as to protect the environment, and the public health, and conserve the resources of the agency. Testing of the appropriate areas which were used for hazardous waste storage and testing of areas which were not storage areas , but which the agency has chosen to specify will be carried out under the

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direction of an independent registered professional engineer in accordance with this closure plan.

Verification of Decontamination:

In order to verify that the decontamination processes already completed at the facility have resulted in satisfactory decontamination the tests listed in this section will be made by the independent registered professional engineer and an independent testing laboratory to verify the level of chemical constituents of interest which are now present in the buildings.

The area of the first floor of the two story building in which waste was stored will be checked using wipe tests of the area to check for the levels of the following contaminants: chromium, nickel, and cyanide. This is the area in which waste generated during the cleaning of the basement was stored. The area is labeled as the Storage Area A on the attached facility diagram. The floor in this area is of concrete construction.

The chemical storage room in the southwest corner of the one story building was used as a waste storage area for sludge generated during nickel treatment. The floor of the room will be wipe tested to check for the following contaminants: nickel, chromium, cyanide. The floor is of concrete construction. A few cracks in the floor have been grouted in with concrete floor repairing material. This area is labeled as Storage Area B in the facility diagram.

The northwest corner of the one story building was used for storing process chrome plating solution in drums to be reused in the process or sold when the plating operation was discontinued. The material was not hazardous waste since it was meant to be recycled internally within the facility. The area was not a hazardous waste storage area. The area is identified as Chrome Solution Holding Area on the facility diagram. In order to expedita the closure wipe tests will be carried out on this non-storage area to check for chromium, nickel, and cyanide.

The basement of the two story building was used as a stripping area for parts. Two small tanks were built on site in the



basement (about one hundred gallon capacity each). The tanks are of steel construction. The tanks are currently empty and were cleaned along with thew other process equipment by Aero Plating personnel. The tanks cannot easily be removed from the basement. The tanks will both be checked using wipe tests to check the inside and outside of each tank for the lavels of the following contaminants: chromium, nickel, cyanide.

The basement inself was not used for hazardous material storage. Any contamination in the basement would have been the result of production, related contamination, not the storage of hazardous waste products. Floor spillage was transferred to the waste treatment system in the one story building for pretreatment. The agency has expressed concern that the production area of the basement has not been adequately cleaned of production related contamination. The cailing of the basement and the floor and walls of the basement will be wipe tested to determine the levels of contamination for the following: chromium, nickel, and cyanide. The basement is not currently in use for any purpose.

A process tank was used at the east end of the first floor of the one story building to treat process nickel solution. The tank was not used for hazardous waste storage. The tank has been removed along with the rest of the process equipment which was cleaned and sold. The floor area under the tank will be checked using wipe tests to check for levels of chromium, nickel, and cyanide. The area is shown on the diagram as Nickel Process Tank Area.

The floor area which was under the waste water pretreatment system will be wipe tested to check for levels of chromium, nickel, and cyanide. This area of the one story building is designated on the diagram. This area was not a hazardous waste storage area, but rather a processing area for the hazardous waste generator.

The floor area which was under the plating line will also be wipe tested to check for levels of chromium, nickel, and cyanide. This area of the two story building is shown on the facility diagram. The area was not a hazardous state storage area.

If in the opinion of the independent registered professional engineer any of the areas need further cleaning to protect the public health or the environment the cleaning will be specified by the engineer and carried out by Aero Plating personnel or by an outside contractor knowledgeable in such cleaning procedures. Any waste generated by additional cleaning will be treated as hazardous waste and properly disposed of through licensed disposal or treatment facilities. All tools or equipment used in such a cleaning will be properly cleaned. Clean up personnel, if needed, will utilize proper protective clothing, such as face shields, rubber gloves, rubber boots, chemically resistant splash suits and hats. Such equipment will be specified by the engineer based on the clean up being carried out. Typical cleaning



procedures would involve the use of manual scrub brushes, detergent, blacch, acid, and solvent solutions, manual scrapping tools, five gallon plastic buckets, and 55 gallon drums suitable for the cleaners and waste being removed. Because there are current tenants in the building the amount of overspray and general disruption should be kept to a minimum when choosing cleaning methods.

Wastes Shipped Off-site:

All waste involved in the closure of the hazardous waste storage facility along with waste generated in ceasing operations as an electroplater was sent to Chemical Waste Management facilities. The uniform waste manifest copies are not in the possession of Aero Plating at this time. Some correspondence and Metropolitan Sanitary District of Greater Chicago manifests are in the records of Aero Plating. We are currently requesting any copies of the manifest forms from the Chemical Waste Management facilities involved in order to complete our records.

At this time it appears that nine drums of nickel sludge from the hazardous waste storage facility area "B" were shipped to Chemical Waste Management's Emelle, Alabama site (ALD0006222464) on June 4, 1984.

At this time it also appears that a combination of wastes totaling (49) fifty-five gallon drums from both the hazardous waste storage facility and from the hazardous waste generation related to the business were shipped to the same facility on September 28, 1984) We feel that nine of the 49 drums were waste from the storage facility. In our opinion the waste was the material cleaned up from the basement of the two story building which had been stored in the mine drums in area"A" of the hazardous waste storage facility.





Expected Closure Date:

Aero Plating expects its hazardous waste drum storage areas to be certified as being closed during 1988. In order to affect this, the following closure schedule is being adopted.

Dates are based on the date of final approval of the closure plan by the IEPA as being Day"0"

By Day "30" Complete initial wipe tests of specified areas.

By Day "60" Complete any further decontamination of the facility if such cleaning was specified by the engineer. Mave independent la pratory retest to verify decontamination of areas involved.

By Day "75" complete testing of areas to verify decontamination.

By Day "95" complete testing of any wastes generated during further cleaning activities.

By Day "115" send any additional wastes to proper disposal or treatment site.

By Day "145" obtain all completed manifests from ultimate treatment or disposal site for any additional waste generated from the clean up activities.

By Day "120" have independent professional registered engineer certify closure of the facility in accordance with the provisions of this plan

By Day"130" submit by certified mail, certification of closure by Aero Plating and the independent registered professional engineer to the proper environmental authorities.

Respectfully submitted, SCIENTIFIC CONTROL LABORATORIES, INC.

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Ronald	Α.	Bahr,	P.E.	

